

WILDLIFE PROTECTION GUIDELINES FOR OIL SPILL RESPONSE IN ALASKA



Alaska Regional Response Team

Wildlife Protection Committee

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TABLE OF CONTENTS

TABLE OF CONTENTS	I
TABLE OF FIGURES	IV
TABLE OF TABLES	V
ACRONYMS AND ABBREVIATIONS	VI
INITIAL EMERGENCY CONTACTS	VIII
1000 – INTRODUCTION	1-1
1600 – NATIONAL POLICY AND DOCTRINE	1-1
1610 – RELATIONSHIP TO NATIONAL PLANNING REQUIREMENTS AND GUIDANCE	1-1
1620 – FISH AND WILDLIFE ACTS COMPLIANCE	1-1
1620.1 – Migratory Bird Treaty Act (MBTA)	1-2
1620.2 – Marine Mammal Protection Act (MMPA)	1-2
1620.3 – Endangered Species Act (ESA)	1-2
1620.4 – Bald and Golden Eagle Protection Act (BGEPA)	1-3
1620.5 – Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA)	1-3
1620.6 – Nonindigenous Aquatic Nuisance Prevention and Control Act (NANPCA) and National Invasive Species Act (NISA)	1-3
1630 – FEDERAL WILDLIFE RESPONSE GUIDANCE	1-3
1700 – ALASKA STATUTES AND REGULATIONS	1-4
1710 – ALASKA FISH AND WILDLIFE STATUTES, ACTS, AND POLICIES	1-4
1710.1 – Fish Habitat Permit (Title 16 Permit)	1-4
1710.2 – Special Area Permit	1-4
1710.3 – Wildlife Response Permit (Hazing/Deterrence, Salvage/Carcass Collection, and Capture/Rehabilitation)	1-4
2000 – COMMAND	2-1
2400 – LIAISON OFFICER	2-1
2470 – SUBSISTENCE RESOURCES	2-1
2500 – NATURAL RESOURCE DAMAGE ASSESSMENT AND RESTORATION (NRDAR)	2-2
2510 – COORDINATING CARCASS COLLECTIONS	2-3
3000 – OPERATIONS	3-1
3600 – WILDLIFE	3-1
3610 – WILDLIFE RESPONSE BEST MANAGEMENT PRACTICES (BMPs)	3-1
3620 – GENERAL WILDLIFE PROTECTION CONSIDERATIONS	3-2
3630 – VESSEL GROUNDING OR SINKING RESPONSE	3-4
3630.1 – Preventing Rat Introduction to Alaska’s Rat-Free Islands	3-4
3630.2 – Entanglement and Fishing Gear	3-5
3630.3 – Disposal of On-Board Catch	3-6
3630.4 – Preventing Spread of Invasive Species Other than Rats	3-7
3630.5 – Preventing Impacts to Wildlife and Habitats during Vessel Removal, Salvage, or Scuttling	3-8
3640 – WILDLIFE BRANCH	3-9

3640.1 – Wildlife Reconnaissance (Recon)	3-10
3640.1.1 – Authorizations and Permits for Wildlife Recon	3-11
3640.2 – Wildlife Protection Strategies	3-11
3640.2.1 – Primary Response Strategies.....	3-12
3640.2.1.1 – Carcass Collection and Documentation.....	3-12
3640.2.1.1.1 – Collection and Documentation of Large Carcasses	3-13
3640.2.1.1.2 – Authorizations and Permits for Carcass Collection	3-13
3640.2.2 – Secondary Response Strategies	3-16
3640.2.2.1 – Wildlife Hazing/Deterrence	3-16
3640.2.2.1.1 – Authorizations and Permits for Wildlife Hazing/Deterrence	3-16
3640.2.2.2 – Pre-emptive Capture	3-17
3640.2.2.2.1 – Authorizations and Permits for Pre-emptive Capture.....	3-17
3640.2.2.3 – Authorizations and Permits for Secondary Response Strategies	3-17
3640.2.3 – Tertiary Response Strategies.....	3-20
3640.2.3.1 – Tertiary Response Guidelines.....	3-20
3640.2.3.2 – Authorizations and Permits for Tertiary Response Activities.....	3-20
3650 – REQUEST FOR WILDLIFE RESPONSE ACTIVITIES.....	3-23
3650.1 – Startup Wildlife Response Plan (WRP).....	3-23
3650.2 – Comprehensive Wildlife Response Plan (WRP).....	3-24
3650.3 – Inadvertent Impacts of Wildlife Response Activities	3-25
4000 – PLANNING	4-1
4600 – ENVIRONMENTAL UNIT (EU)	4-1
4610 – PLANNING ACTIVITIES FOR FISH AND WILDLIFE PROTECTION	4-1
4610.1 – Resources at Risk Summary	4-1
4610.2 – Environmentally Sensitive Areas, Areas of Public Concern, and Potential Wildlife Impacts	4-1
4610.3 – General Wildlife Protection Considerations	4-1
4610.3.1 – Preventing Rat Introduction to Rat-Free Islands.....	4-2
4610.3.2 – Preventing Unnecessary or Illegal Disturbance to Sensitive Species and Habitats...4-2	
4610.3.3 – Preventing Injury and Disturbance to Bears	4-3
4610.3.4 – Preventing the Collection of Wildlife Parts for Personal Use.....	4-3
4610.3.5 – Preventing Wildlife Exposure to Shoreline Treatment Chemicals	4-4
4610.4 – Wildlife Standards of Response	4-4
4610.4.1 – Standards of Response for Migratory Birds	4-4
4610.4.2 – Standards of Response for Marine Mammals under NMFS’s jurisdiction in Alaska	4-4
4610.4.3 – Standards of Response for Sea Otters in Alaska	4-4
4610.4.4 – Standards of Response for Polar Bears in Alaska.....	4-5
4610.5 – Wildlife Protection Strategies	4-6
4610.5.1 – Primary Response Strategies.....	4-6
4610.5.2 – Secondary Response Strategies	4-8
4610.5.3 – Tertiary Response Strategies.....	4-10
4800 – REQUIRED CORRESPONDENCE, PERMITS & CONSULTATION	4-12
4810 – ENDANGERED SPECIES ACT (ESA) CONSULTATIONS	4-12
4820 – PERMITS.....	4-15
4820.1 – Fish and Wildlife Permit Tools.....	4-15
9000 – APPENDICES	9-1

9700 – RESPONSE REFERENCES.....	9-1
9740 – ENVIRONMENTAL, FISH & WILDLIFE PROTECTION PLANS	9-1
9740.1 - Wildlife Protection Guidelines History & Revision Process	9-1
9740.1.1 – WPC Organization and WPG Versions.....	9-1
9740.1.2 – Objectives	9-2
9740.1.3 – WPG and Contingency Planning in Alaska.....	9-2
9740.1.4 – Related Wildlife Plans.....	9-3
9740.2 – Species Information	9-4
9740.2.1 – Migratory Birds.....	9-4
9740.2.1.1 – Migratory Bird Protection Priorities	9-4
9740.2.1.2 – Migratory Bird Response Strategies	9-10
9740.2.1.2.1 – Primary Response	9-10
9740.2.1.2.2 – Secondary Response.....	9-10
9740.2.1.3 – Tertiary Response.....	9-12
9740.2.2 – Marine Mammals	9-13
9740.2.2.1 – Marine Mammal Protection Priorities	9-13
9740.2.2.2 – Marine Mammal Response Strategies	9-16
9740.2.2.2.1 – Primary Response	9-16
9740.2.2.2.2 – Secondary Response.....	9-16
9740.2.2.2.3 – Tertiary Response	9-17
9740.2.2.3 – Marine Mammal Information by Species.....	9-18
9740.2.2.3.1 – Sea Otters	9-18
9740.2.2.3.2 – Pinnipeds	9-20
9740.2.2.3.3 – Cetaceans (Baleen and Toothed Whales).....	9-31
9740.2.2.3.4 – Polar Bears.....	9-32
9740.2.3 – Terrestrial Mammals	9-35
9740.2.3.1 – Terrestrial Mammal Protection Priorities	9-35
9740.2.3.2 – Terrestrial Mammal Response Strategies	9-37
9740.2.3.2.1 – Primary Response	9-37
9740.2.3.2.2 – Secondary Response.....	9-38
9740.2.3.2.3 – Tertiary Response.....	9-38
9740.2.3.3 – Terrestrial Mammal Information by Species.....	9-38
9740.2.3.3.1 – Ungulates.....	9-38
9740.2.3.3.2 – Brown and Black Bears	9-41
9740.2.3.3.3 – Wolves	9-43
9740.2.3.3.4 – Furbearers	9-43
9740.2.3.3.5 – Miscellaneous Small Mammals	9-48
9740.3 – Wildlife Response Tactics, Guidelines, and Forms.....	9-49
9740.3.1 – Tactic: Wildlife Reconnaissance (Recon).....	9-50
9740.3.2 – Tactic: Collection of Small Carcasses and Documentation of Large Carcasses	9-61
9740.3.3 – Wildlife Capture Forms.....	9-79
9740.3.4 – Checklist: Vessel Grounding or Sinking Response.....	9-89
9740.3.5 – Rat Prevention Guidelines for Vessels	9-92
9740.3.6 – Initiation and Close-Out Forms for ESA Section 7 Consultation.....	9-94
9740.3.7 – Wildlife Response Plans (WRPs).....	9-106
9740.3.7.1 – Startup WRP	9-107
9740.3.7.2 – Comprehensive WRP	9-121

TABLE OF FIGURES

FIGURE CONTACTS-1: MAP DEPICTING ADF&G OFFICE AREAS OF RESPONSIBILITY	IX
FIGURE 3-1: WILDLIFE RESPONSE FLOW CHART.	3-3
FIGURE 3-2: LOCATION OF KNOWN BREEDING POPULATIONS OF RATS IN ALASKA.....	3-4
FIGURE 4-1: CARCASS COLLECTION PERMITS FLOW CHART.	4-7
FIGURE 4-2: WILDLIFE HAZING/DETERRENCE PERMITS FLOW CHART.	4-9
FIGURE 4-3: WILDLIFE CAPTURE, TRANSPORT, STABILIZATION, OR REHABILITATION PERMITS FLOW CHART.....	4-11
FIGURE 4-4: ESA SECTION 7 CONSULTATION FLOW CHART.....	4-14
FIGURE 9-1: WILDLIFE OBSERVATION FORM (TWO PAGES).	9-57
FIGURE 9-2: CARCASS COLLECTION JOB AID FOR SMALL CARCASSES	9-70
FIGURE 9-3: CARCASS COLLECTION FORM (TWO PAGES).....	9-72
FIGURE 9-4: INDIVIDUAL CARCASS IDENTIFICATION TAG	9-75
FIGURE 9-5: CARCASS CHAIN OF CUSTODY (COC) TAG	9-76
FIGURE 9-6: CARCASS INTERMEDIATE TRANSPORTERS LOG (TWO PAGES).	9-77
FIGURE 9-7: LIVE ANIMAL CAPTURE FORM.....	9-80
FIGURE 9-8: CAPTURE LOG FOR LIVE ANIMALS.....	9-83
FIGURE 9-9: TRANSPORT LOG FOR LIVE ANIMALS	9-86
FIGURE 9-10: LOCATION OF KNOWN BREEDING POPULATIONS OF RATS IN ALASKA.....	9-91
FIGURE 9-12: ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT (ESA) SECTION 7 POST- RESPONSE CONSULTATION CLOSE-OUT FORM.	9-102
FIGURE 9-13: STARTUP WILDLIFE RESPONSE PLAN (WRP)	9-108
FIGURE 9-14: COMPREHENSIVE WILDLIFE RESPONSE PLAN (WRP).....	9-122

TABLE OF TABLES

TABLE CONTACTS-1: ADF&G CONTACTS BY AREA OF RESPONSIBILITY AND OFFICE LOCATION	X
TABLE 2-1: TYPICAL NRDAR TRUSTEE AGENCIES IN ALASKA	2-2
TABLE 3-1: ISLANDS IN THE ALASKA MARITIME NATIONAL WILDLIFE REFUGE (NWR) KNOWN TO HAVE RATS	3-5
TABLE 3-2: LIST OF AGENCY AND LAND MANAGEMENT CONTACTS FOR REPORTING SUSPECTED OR CONFIRMED INVASIVE SPECIES IN ALASKA.	3-7
TABLE 3-3: WILDLIFE AUTHORIZATIONS AND PERMITS FOR PRIMARY RESPONSE STRATEGIES.	3-14
TABLE 3-4: WILDLIFE AUTHORIZATIONS AND PERMITS FOR SECONDARY RESPONSE STRATEGIES.	3-18
TABLE 3-5: WILDLIFE AUTHORIZATIONS AND PERMITS FOR TERTIARY RESPONSE STRATEGIES.	3-22
TABLE 3-6: COMPARISON OF STARTUP AND COMPREHENSIVE WILDLIFE RESPONSE PLANS (WRPs) FOR OIL SPILL RESPONSE IN ALASKA.	3-23
TABLE 3-7: ORGANIZATION OR PERSON RESPONSIBLE FOR COMPLETING SECTIONS OF THE STARTUP WILDLIFE RESPONSE PLAN (WRP) FOR OIL SPILL RESPONSE IN ALASKA.	3-24
TABLE 3-8: ORGANIZATION OR PERSONS RESPONSIBLE FOR COMPLETING SECTIONS OF THE COMPREHENSIVE WILDLIFE RESPONSE PLAN (WRP) FOR OIL SPILL RESPONSE IN ALASKA.	3-25
TABLE 4-1: WILDLIFE AUTHORIZATIONS AND PERMITS REQUIRED PRIOR TO IMPLEMENTING RESPONSE TACTICS	4-16
TABLE 4-2: WILDLIFE AUTHORIZATIONS AND PERMITS REQUIRED FOR HAZING/DETERRING, COLLECTING, OR HOLDING WILDLIFE	4-17
TABLE 9-1: BIRD SPECIES GROUP SUSCEPTIBILITY TO OILING.	9-5
TABLE 9-2: IMPORTANT BIRD HABITATS THAT ARE HIGH PRIORITY PROTECTION AREAS, DEPENDING ON SEASON.	9-6
TABLE 9-3: STATUS OF AVIAN SPECIES OF CONCERN BY GEOGRAPHIC ZONE IN ALASKA. CRITERIA FOR INCLUSION ARE: THE POPULATION OF THE SPECIES IN THE PLANNING AREA REPRESENTS A SIGNIFICANT PROPORTION OF THE SPECIES' TOTAL WORLD POPULATION; THE SPECIES, OR SPECIES GROUP, IS KNOWN TO BE PARTICULARLY VULNERABLE TO IMPACTS FROM AN OIL SPILL; THE SPECIES HAS BEEN GIVEN A SPECIAL STATUS BY STATE OR FEDERAL AGENCIES; OR THE SPECIES IS AN IMPORTANT SUBSISTENCE RESOURCE.	9-7
TABLE 9-4: STATUS OF MARINE MAMMALS BY GEOGRAPHIC ZONE IN ALASKA.	9-14
TABLE 9-5: STATUS OF TERRESTRIAL MAMMAL SPECIES OF CONCERN BY GEOGRAPHIC ZONE IN ALASKA. CRITERIA FOR INCLUSION ARE: THE POPULATION OF THE SPECIES IN THE PLANNING AREA REPRESENTS A SIGNIFICANT PROPORTION OF THE SPECIES' TOTAL WORLD POPULATION; THE SPECIES, OR SPECIES GROUP, IS KNOWN TO BE PARTICULARLY VULNERABLE TO IMPACTS FROM AN OIL SPILL; THE SPECIES HAS BEEN GIVEN A SPECIAL STATUS BY STATE OR FEDERAL AGENCIES; OR THE SPECIES IS AN IMPORTANT SUBSISTENCE RESOURCE.	9-36
TABLE 9-6: EQUIPMENT, VEHICLES OR VESSELS, AND PERSONNEL FOR WILDLIFE RECON TACTIC.	9-54
TABLE 9-7: EQUIPMENT, VEHICLES OR VESSELS, AND PERSONNEL FOR CARCASS COLLECTION TACTIC.	9-65
TABLE 9-8: CITIES, TOWNS, AND VILLAGES IN ALASKA WITH KNOWN BREEDING POPULATIONS OF RATS.	9-91
TABLE 9-9: ISLANDS IN THE ALASKA MARITIME NATIONAL WILDLIFE REFUGE (NWR) KNOWN TO HAVE RATS.	9-91

1 ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
ACP	Area Contingency Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AKEPIC	Alaska Exotic Plants Information Clearinghouse
AKMMDRG	Alaska Marine Mammal Disaster Response Guidelines
<i>Alaska RCP</i>	<i>Alaska Regional Contingency Plan</i>
ARRT	Alaska Regional Response Team
AS	Alaska Statute
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
CANUSDIX	Canada-U.S. Dixon Entrance
CFR	Code of Federal Regulations
CoC	Chain of Custody
DOC	U.S. Department of Commerce
DOI	U.S. Department of the Interior
DPS	Distinct Population Segment
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
EU	Environmental Unit
FOSC	Federal On-Scene Coordinator
GIS	geographic information system
GPS	Global Positioning System
IAP	Incident Action Plan
ICS	Incident Command System
IMT	Incident Management Team
JIC	Joint Information Center
LOA	Letter of Authorization
MBTA	Migratory Bird Treaty Act
MMHSRP	Marine Mammal Health and Stranding Response Program
MMPA	Marine Mammal Protection Act
MPRSA	Marine Protection, Research, and Sanctuaries Act
MSFCMA	Magnuson-Stevens Fishery Conservation and Management Act
NANPCA	Nonindigenous Aquatic Nuisance Prevention and Control Act
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NISA	National Invasive Species Act
NMFS	National Marine Fisheries Service (synonymous with NOAA Fisheries)
NOAA	National Oceanic and Atmospheric Administration
NRDAR	Natural Resource Damage Assessment and Restoration
NWR	National Wildlife Refuge

OEPC	Office of Environmental Policy and Compliance
OLE	Office of Law Enforcement
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator
OSRO	Oil Spill Removal Organization
PPE	Personal Protective Equipment
PRAC	Primary Response Action Contractor
<i>Pribilof Guidelines</i>	<i>Wildlife Protection Guidelines: Pribilof Islands</i>
RCAC	Regional Citizens' Advisory Council
RP/PRP	Responsible Party/Potential Responsible Party
SOSC	State On-Scene Coordinator
SSC	Scientific Support Coordinator
UAS	Unmanned Aircraft System
<i>Unified Plan</i>	<i>Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Discharges/Releases</i>
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
WB	Wildlife Branch
WBD	Wildlife Branch Director
WPC	Wildlife Protection Committee
WPG	Wildlife Protection Guidelines for Oil Spill Response in Alaska
WRP	Wildlife Response Plan

2
3

INITIAL EMERGENCY CONTACTS

FEDERAL WILDLIFE AGENCY POINTS OF CONTACT

U.S. Fish and Wildlife Service (USFWS)

Migratory bird capture and salvage, eagles, sea otters, walruses, polar bears, salmon, Endangered Species Act (ESA) section 7 consultation

Statewide contacts

Primary:

Alaska Region Spill Response Team
(907) 242-6893
fwsakspillresponse@fws.gov

Alternate:

Angela Matz
(907) 750-8527
angela_matz@fws.gov

National Marine Fisheries Service (NMFS) / NOAA Fisheries¹

Whales, porpoises, seals, sea lions, marine fish, ESA section 7 consultation

Statewide contacts

Primary:

Sadie Wright
(907) 586-7630
sadie.wright@noaa.gov

Alternate:

David Gann
(907) 586-7285
david.gann@noaa.gov

¹ Within the U.S. Department of Commerce (DOC), NMFS is organized under the National Oceanic and Atmospheric Administration (NOAA); NMFS is also referred to as NOAA Fisheries.

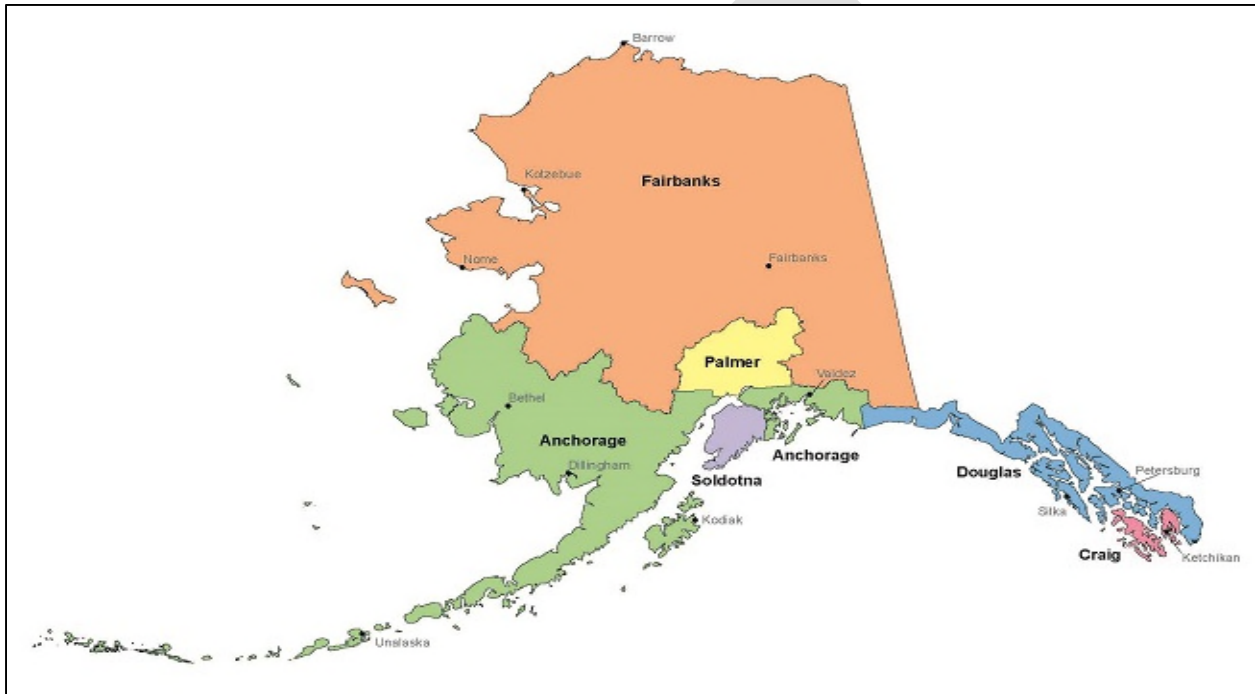
STATE WILDLIFE AGENCY POINTS OF CONTACT

Alaska Department of Fish and Game (ADF&G)

Migratory bird hazing, terrestrial mammals, anadromous fish, freshwater fish

Figure CONTACTS-1 shows ADF&G office areas of responsibility. Table CONTACTS-1 shows ADF&G contacts by areas of responsibility and office location.

Figure CONTACTS-1: Map Depicting ADF&G Office Areas of Responsibility



1 Table CONTACTS-1: ADF&G Contacts by Area of Responsibility and Office Location

Area Plan	Location	Contact Information
Inland, Prince William Sound, Western and Arctic Alaska	<u>Anchorage</u> Southcentral and southwest Alaska, Prince William Sound, Cook Inlet, Kodiak	Jeanette Alas (907) 267-2805 jeanette.alas@alaska.gov
	Habitat main office (907) 267-2342	Scott Graziano (907) 267-2143 scott.graziano@alaska.gov
Inland, Prince William Sound	Trans-Alaska Pipeline System, Valdez Marine Terminal	Lee McKinley (907) 269-6411 lee.mckinley@alaska.gov
Inland, Western and Arctic Alaska	<u>Fairbanks</u> North Slope, interior, Arctic, northwest Alaska	Todd Nichols (907) 459-7363 todd.nichols@alaska.gov
	Habitat main office (907) 459-7289	Jack Winters (907) 459-7285 jack.winters@alaska.gov
Southeast	<u>Douglas</u> Southeast Alaska (except Prince of Whales and Ketchikan)	Greg Albrecht (907) 465-6384 greg.albrecht@alaska.gov
	Habitat main office (907) 465-4105	Kate Kanouse (907) 465-4290 kate.kanouse@alaska.gov
Southeast	<u>Craig</u> Prince of Whales, Ketchikan	Mark Minnillo (907) 826-2560 mark.minnillo@alaska.gov
Inland	<u>Soldotna</u> Kenai Peninsula, West Cook Inlet	Brian Blossom (907) 714-2481 brian.blossom@alaska.gov
	Habitat main office (907) 714-2475	
Inland	<u>Palmer</u> Mat-Su	Sarah Wilber (907) 861-3206 sarah.wilber@alaska.gov
	Habitat main office (907) 861-3200	Jonathan Kirsch (907) 861-3203 jonathan.kirsch@alaska.gov

2

3 ADF&G representatives can be reached outside of normal business hours through the State On-Scene
4 Coordinator (SOSC) for each incident.

NATURAL RESOURCE TRUSTEES

A list of the natural resource trustee emergency contacts can be found on the Alaska Regional Response Team (ARRT) [Members and Contact Information](#) web page.

WILDLIFE AGENCY NOTIFICATION

As outlined in the *Alaska Regional Contingency Plan (Alaska RCP)*; available on the Alaska Department of Environmental Conservation (ADEC) [Regional Contingency Plan](#) web page), oil spills and hazardous substance releases are reported, in accordance with existing regulations, to the U.S. Coast Guard (USCG) or the U.S. Environmental Protection Agency (EPA), and the ADEC. In turn, the USCG or EPA, and ADEC supply information on the incident to pre-identified federal and state natural resource agencies. For a current list of these contacts, see the ARRT [Members and Contact Information](#) web page.

Information on wildlife resources at risk, sensitive habitats, and recommendations for appropriate wildlife response strategies and other activities to help minimize impacts to wildlife will be provided to the Federal and State On-Scene Coordinators (OSCs) through wildlife agency staff. If an Incident Management Team (IMT) is established, U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and ADF&G representatives will provide their input to the Federal and State OSCs, respectively, as agency representatives through the Liaison Officer within the Command Section, or through the Environmental Unit (EU) in the Planning Section. In the event field-based activities are authorized and conducted, USFWS, NMFS, and ADF&G representatives will also work in the Wildlife Branch (WB) in the Operations Section. For incidents with significant effects, or the potential for significant effects, on migratory birds, marine mammals, and terrestrial mammals under federal wildlife agency management, USFWS and NMFS have the option of providing input directly to the Unified Command.

If wildlife response activities are approved and initiated for migratory birds or marine mammals, USFWS or NMFS will assume lead responsibility for wildlife under their respective jurisdiction; ADF&G will assist on a case-by-case basis. If wildlife response activities are approved and initiated for terrestrial mammals, ADF&G will assume lead responsibility on state and private lands; on federally managed lands, ADF&G will be co-lead with the federal land manager.

In the event that response strategies are proposed in locations where species listed as threatened or endangered under the ESA or marine mammals are (or may be) present, the Federal On-Scene Coordinator (FOSC) will need to immediately consult with USFWS and NMFS regarding the proposed strategies to ensure compliance with the ESA and Marine Mammal Protection Act (MMPA).

1000 – INTRODUCTION

Alaska's offshore areas, rivers, wetlands, and 47,300 miles of tidal coastline provide seasonal feeding, breeding, reproducing, rearing, and staging grounds for large numbers of migratory birds, fish, marine and terrestrial mammals, and their prey; Alaska may host the majority of some species' global population. Billions of pounds of fish and shellfish are harvested commercially in Alaska's waters each year, supporting tens of thousands of jobs. Sport fishing and hunting activities also provide a large economic benefit to Alaskans. Moreover, Alaska's fish and wildlife populations include vitally important subsistence resources. The Wildlife Protection Guidelines for Oil Spill Response in Alaska (WPG) provide guidance for minimizing effects of an oil spill on Alaska's wildlife resources.

During a marine oil spill, wildlife can come into contact with oil on the water surface along shorelines, marshes, tidelands, in the water column, and on the seafloor. Spills can impact freshwater and terrestrial wildlife in lakes, rivers, streams, wetlands, and the land surrounding those waters. Species and numbers of wildlife affected by an oil spill will depend on the location, size, and oil characteristics, weather and water conditions, habitats affected, and time of year.

The WPG applies to offshore and coastal marine, inland freshwater, and terrestrial areas of Alaska. The WPG focuses primarily on wildlife species in offshore and coastal marine areas because of the potential for significant effects of oil spills in marine environments, but response strategies may apply equally well in freshwater and terrestrial spill scenarios, including spills from the Trans-Alaska Pipeline.

The WPG is organized and numbered to match the structure of the four Alaska Area Contingency Plans (ACPs): Alaska Inland, Arctic and Western Alaska, Prince William Sound, and Southeast Alaska. The WPG is maintained on the ADEC [Area Plan References and Tools](#) web page and incorporated by reference into the four ACPs.

1600 – NATIONAL POLICY AND DOCTRINE

1610 – Relationship to National Planning Requirements and Guidance

As required in title IV, section 4201 of the Oil Pollution Act of 1990 (OPA 90), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) set forth requirements in 300.210(c)(4)(i) for ACPs to include "...coordinated, immediate and effective protection, rescue, and rehabilitation of, and minimization of risk of injury to, fish and wildlife resources and habitat." The WPG fulfills the NCP requirements regarding wildlife response planning. Additionally, the WPG was developed to satisfy the USCG Area Contingency Planning Policy as stipulated in the Marine Environmental Response and Preparedness Manual, chapter 4, Area Contingency Plan Policy, section C, part 2a(6).

For additional information on federal, state, tribal, and local authorities, refer to the *Alaska RCP*. For food-related statutes, regulations, and authorities, see *Ensuring Food Safety Following an Oil Spill in Alaska: Regulatory Authorities and Responsibilities*, available on the Oil Spill Recovery Institute [Available Reports](#) web page.

1620 – Fish and Wildlife Acts Compliance

Under federal statutes, the U.S. Department of the Interior's (DOI) USFWS has responsibility for managing and protecting migratory birds under the Migratory Bird Treaty Act (MBTA); eagles under the Bald and Golden Eagle Protection Act (BGEPA); ESA-listed birds; walruses, sea otters, and polar bears under the MMPA and the ESA; and ESA-listed freshwater fishes (although none are listed in Alaska at

1 this time). The U.S. Department of Commerce's (DOC) NMFS² has responsibility for managing and
2 protecting cetaceans and pinnipeds (except walruses, sea otters, and polar bears) under the MMPA and
3 ESA; and marine fishes and invertebrates under the ESA and Magnuson-Stevens Fishery Conservation
4 and Management Act (MSFCMA). Under State of Alaska statutes, the ADF&G is mandated to manage
5 and protect all wildlife resources and has joint statutory responsibilities with NMFS and USFWS. The
6 USFWS also has joint statutory responsibilities with ADF&G for wildlife on all federal lands in Alaska
7 (National Park System units, National Wildlife Refuges (NWRs), National Forest System lands, military
8 reservations, and other federally managed public lands).

9 1620.1 – Migratory Bird Treaty Act (MBTA)

10 The USFWS has responsibility for the administration of the MBTA, which makes it illegal to take, possess,
11 import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird
12 or the parts (including feathers), nests, or eggs of such birds except under the terms of a valid federal
13 permit or under subsistence regulations.

14 For more information on the MBTA, please refer to the USFWS [Migratory Bird Treaty Act](#) web page.

15 1620.2 – Marine Mammal Protection Act (MMPA)

16 All marine mammals are protected under the MMPA. The MMPA, with certain exceptions, prohibits the
17 "take"³ of marine mammals in U.S. waters. The NMFS and USFWS are responsible for administration of
18 the MMPA for the marine mammals under their respective authorities.

19 The primary objectives of the MMPA are to:

- 20 • Prevent marine mammal species and stocks from diminishing to the point that they are no
21 longer a significant functioning part of their ecosystems.
- 22 • Restore diminished species and stocks to their optimum sustainable populations.

23 For more information on the MMPA, please refer to the National Oceanic and Atmospheric
24 Administration (NOAA) Fisheries [Laws and Policies](#) web page and the USFWS International Affairs
25 [Marine Mammal Protection Act](#) web page.

26 1620.3 – Endangered Species Act (ESA)

27 The ESA of 1973, as amended, 16 United States Code (U.S.C.) §1531 *et seq.*, was established to foster
28 the conservation of threatened and endangered plants and animals and their habitats. The NMFS is
29 responsible for administration of the ESA as it applies to cetaceans, pinnipeds (except walruses), and
30 other marine species. The USFWS is responsible for the administration of the ESA as it applies to sea
31 otters, polar bears, and birds. The law requires federal agencies to consult with NMFS and USFWS to
32 ensure that actions they authorize, fund, or conduct are not likely to jeopardize the continued existence
33 of ESA-listed species or adversely modify designated critical habitats.

34 For more information on the ESA, please refer to the NOAA Fisheries [Laws and Policies](#) web page and
35 the USFWS [Endangered Species Act](#) web page.

² Within the DOC, NMFS is organized under the National Oceanic and Atmospheric Administration (NOAA); NMFS is also referred to as NOAA Fisheries.

³ Take, as defined under the MMPA, means "to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal."

1620.4 – Bald and Golden Eagle Protection Act (BGEPA)

The BGEPA was established to protect bald and golden eagles throughout the U.S. The USFWS has responsibility for the administration of the BGEPA.

For more information on the BGEPA, please refer to the USFWS [Bald & Golden Eagle Protection Act](#) web page.

1620.5 – Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA)

The MSFCMA is the primary law governing marine fisheries management in U.S. federal waters. The MSFCMA was established to ensure the long-term biological and economic sustainability of our nation's marine fisheries. NMFS has responsibility for the administration of the MSFCMA.

For more information on the MSFCMA, please refer to the NOAA Fisheries [Laws and Policies](#) web page.

1620.6 – Nonindigenous Aquatic Nuisance Prevention and Control Act (NANPCA) and National Invasive Species Act (NISA)

NANPCA and NISA were primarily enacted to prevent and control infestations of the coastal inland waters of the U.S. by nonindigenous aquatic nuisance species.

For more information on NANPCA, please refer to the USFWS [Digest of Federal Resource Laws](#) web page. For more information on NISA, please refer to the USFWS Fish and Aquatic Conservation [Laws, Policies and Regulations](#) web page.

For more information on invasive species in general, please refer to the USFWS [Aquatic Invasive Species](#), U.S. Department of Agriculture [National Invasive Species Information Center](#), [Aquatic Nuisance Species Task Force](#), and the ADF&G [Invasive Species](#) web pages.

1630 – Federal Wildlife Response Guidance

The WPG incorporates guidance from the following wildlife response documents:

Pinniped and Cetacean Oil Spill Response Guidelines (National Guidelines)

Ziccardi, M.H., S.M. Wilkin, T.K. Rowles, and S. Johnson. 2015. Pinniped and Cetacean Oil Spill Response Guidelines. U.S. DOC, NOAA. NOAA Technical Memorandum NMFS-OPR-52, 138 p. Available on the [NOAA Institutional Repository](#).

Arctic Marine Mammal Disaster Response Guidelines

National Marine Fisheries Service. 2017. NMFS Arctic Marine Mammal Disaster Response Guidelines. U.S. DOC., NOAA Technical Memorandum NMFS-F/AKR-16. 81 p. doi:10.7289/V5/TM-F/AKR-16. Available on the [NOAA Institutional Repository](#).

Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines

National Marine Fisheries Service. 2019. NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines. U.S. DOC., NOAA Technical Memorandum NMFS-F/AKR-22. 79 p. + appendices. Doi:10.25923/g85z ge25. Available on the [NOAA Institutional Repository](#).

Best Practices for Migratory Bird Care during Oil Spill Response

U.S. Fish and Wildlife Service. 2003. Best Practices for Migratory Bird Care during Oil Spill Response. USFWS. 86 pp. Available on the ADEC [Area Plan References and Tools](#) web page.

Emergency Care and Rehabilitation of Oiled Sea Otters

Williams, Terrie M. and Randall W. Davis (eds). 1995. *Emergency Care and Rehabilitation of Oiled Sea Otters: A guide for oil spills involving fur bearing animals*. Fairbanks: University of Alaska Press. 279 pp. Available on the ADEC [Area Plan References and Tools](#) web page.

Oil Spill Response Plan for Polar Bears in Alaska.

Miller, S. (ed.) 2015. *Oil Spill Response Plan for Polar Bears in Alaska* U.S. Fish and Wildlife Service, Anchorage, Alaska. 65 pp. Available on the ADEC [Area Plan References and Tools](#) web page.

1700 – ALASKA STATUTES AND REGULATIONS

1710 – Alaska Fish and Wildlife Statutes, Acts, and Policies

1710.1 – Fish Habitat Permit (Title 16 Permit)

The **Anadromous Fish Act (Alaska Statute (AS) 16.05.871-901)** requires that an individual or government agency provide prior notification and obtain permit approval from ADF&G before altering or affecting “the natural flow or bed” of a specified waterbody or fish stream. All activities within or across a specified anadromous waterbody require approval from the ADF&G Habitat Section, including construction; road crossings; gravel removal; mining; water withdrawals; the use of vehicles or equipment in the waterway; stream realignment or diversion; bank stabilization; blasting; and the placement, excavation, deposition, or removal of any material.

The **Fishway Act or Fish Passage Act (AS 16.05.841)** requires that an individual or government agency notify and obtain authorization from the ADF&G Habitat Section for activities within or across a stream used by fish if it is determined that such uses or activities could represent an impediment to the efficient passage of resident or anadromous fish.

1710.2 – Special Area Permit

Protection of Fish and Game; Refuges, Sanctuaries, Ranges Areas, and Habitat Areas (AS 16.20.110010-690), and 5 Alaska Administrative Code (AAC) 95: “Special Areas” refer to ADF&G State Game Refuges, State Game Sanctuaries, State Ranges, and Critical Habitat Areas. These areas are designated by the Alaska Legislature when it passes a statute describing the legal boundaries of the area, the purpose of the area, and any other specific management considerations for that particular area. Each of the different types of special areas has a different general purpose, though all provide habitat protection. The ADF&G Habitat Section implements a statewide special areas permitting program to manage land and water use activities within a special area. By regulation, permits are required for many activities within a special area (5 AAC 95.420) unless the commissioner has issued a general permit. Access to sanctuaries requires a “Sanctuary Access” permit from the Division of Wildlife Conservation (5 AAC 92.064-.066). Each of the special areas has individual statutes; many of the areas also have management plans that have been adopted into regulation to guide permitting and public use.

1710.3 – Wildlife Response Permit (Hazing/Deterrence, Salvage/Carcass Collection, and Capture/Rehabilitation)

AS 16.05.920. Prohibited Conduct Generally. “(a) Unless permitted by AS 16.05 – AS 16.40 or by regulation adopted under AS 16.05 – AS 16.40, a person may not take, possess, transport, sell, offer to sell, purchase, or offer to purchase fish, game, or marine aquatic plants, or any part of fish, game, or aquatic plants, or a nest or egg of fish or game.”

1 **AS 16.05.940. Definitions.** In AS 16.05 – AS 16.40, “... (19) ‘game’ means any species of bird, reptile, and
2 mammal, including a feral domestic animal, found or introduced in the state, except domestic birds and
3 mammals; and game may be classified by regulation as big game, small game, furbearers or other
4 categories considered essential for carrying out the intention and purposes of AS 16.05 – 16.40; ... (34)
5 ‘take’ means taking, pursuing, hunting, fishing, trapping, or in any manner disturbing, capturing, or
6 killing or attempting to take, pursue, hunt, fish, trap, or in any manner capture or kill fish or game.”

DRAFT

2000 – COMMAND

2400 – LIAISON OFFICER

2470 – *Subsistence Resources*

“Subsistence is sustenance for the life.”⁴

The importance of subsistence in Alaska cannot be overstated. Subsistence is vital to the many cultures, economies, food security, and health of many Alaskans. In many ways, Alaska Native cultures are defined by the specific foods, practices, and reciprocal dependence on their traditional lands and waters that subsistence connections create. These activities connect and express essential elements of the spiritual, mental, emotional, and physical health sustained by subsistence foods. The economic, cultural, and social value of subsistence foods requires that concerns about those foods are addressed promptly and effectively during spill response.

Concerns relating to quality and quantity of subsistence foods that may be impacted by oil spills are characterized by the question, “Is my food safe to eat?” This frequently asked question is difficult to answer immediately and can require a larger discussion about benefits and risks. Initial information about the extent and trajectory of a spill may make it challenging to fully answer the question; however, the best available information should be shared with subsistence users, so they are aware of possible impacts.

The specific subsistence foods at risk, impacted, or of concern to subsistence users will determine the appropriate response methods needed to provide food safety information. When available, this information should be included in the assessment of resources at risk (ICS-232 CG form). Priorities of human safety, property, and spill containment may initially limit the additional data that can be collected to inform subsistence food safety concerns.

The Unified Command may collect and disseminate information about subsistence food safety as it relates to a spill. The ADEC regulates food safety for commercial catches and the Alaska Department of Health and Social Services may also provide information to the public about subsistence food safety after an oil spill. Sometimes additional testing may be appropriate to address public concerns and, due to the complex permitting systems, Alaska Native Co-Management Organizations may be able to expedite food safety testing, or shape and prioritize data collection. Natural Resource Damage Assessment and Restoration (NRDAR) sampling, if conducted, may provide additional data.

Alaskan subsistence users are also concerned about potential impacts to the quality and quantity of subsistence foods after the use of dispersants during a spill response. Communication to the public, and subsistence users in particular, about dispersant use during a spill is recommended. Topics of communication could include the location of dispersant use and anticipated trajectory of oil and dispersant, as well as information regarding the toxicological properties of the dispersant used and its potential health impacts. (Note that dispersants and their use during an oil spill will be addressed through the process outlined in the *Alaska RCP*.)

The rescue, rehabilitation, and release of oiled wildlife is an important response activity. All released birds will be banded with typical U.S. Geological Survey bands. Prior to release into the wild, birds of subsistence species will also receive bands that indicate the bird has been oiled, rehabilitated, and released. Marine mammal marking protocols vary by species, incident, and responsible wildlife agency; agencies will communicate with subsistence users about appropriate marking of oiled, rehabilitated, and

⁴ From the Alaska Native Knowledge Network [VALUES of the Unangan/Unangas](#) web page.

released marine mammals. (Note that details on wildlife banding and other information important to subsistence users will be outlined in incident-specific rehabilitated wildlife release plans, developed with the Responsible Party/Potential Responsible Party (RP/PRP), rehabilitators, and wildlife agencies, under Section IX in the Comprehensive Wildlife Response Plan (WRP).)

During a spill response, it is critically important that the Unified Command explore various approaches to address the communication needs of local communities, geographical considerations, and concerns about oil impacts to subsistence foods. The WPG focuses primarily on oil impacts to wildlife, which in turn affect the availability of animals to serve as a subsistence resource. Human consumption concerns, however, are intended to be addressed in separate ARRT guidance on food safety and security. Additional guidance can be found in *Ensuring Food Safety Following an Oil Spill in Alaska: Regulatory Authorities and Responsibilities*, available on the Oil Spill Recovery Institute [Available Reports](#) web page.

2500 – NATURAL RESOURCE DAMAGE ASSESSMENT AND RESTORATION (NRDAR)

When oil spills or hazardous substance releases occur, state and federal agencies typically conduct emergency response activities to minimize impacts. The primary goals of emergency spill response are to contain, control, and collect oil or hazardous substances to protect human health and the environment. Sometimes the extent of environmental damage requires further restoration. When this occurs, natural resource trustees from state and federal agencies may opt to conduct a NRDAR to restore injured resources. Authorities for natural resource trustees to conduct assessment and restoration activities are described in the NCP (40 Code of Federal Regulations (CFR) part 300); Clean Water Act (33 U.S.C. 1251-1376); Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 *et seq.*); and OPA 90 (33 U.S.C. 2701 *et seq.*). The State of Alaska has authority to pursue any person who injures or degrades the environment of the state under AS 46.03.780 Liability for Restoration. Table 2-1 shows typical NRDAR Trustee agencies in Alaska.

Table 2-1: Typical NRDAR Trustee Agencies in Alaska

U.S. Fish and Wildlife Service	Alaska Department of Natural Resources
National Oceanic and Atmospheric Administration	National Park Service
Alaska Department of Environmental Conservation	Bureau of Land Management
Alaska Department of Fish & Game	Bureau of Indian Affairs
Alaska Department of Law	U.S. Forest Service

Note: Participation by a specific agency in NRDAR depends on whether the spill affects (or is likely to affect) natural resources under its jurisdiction. For spills under OPA 90, incident-specific NRDAR Trustees can include other state and federal agencies that own, manage, or control natural resources; federally recognized tribes that have governmental authority over lands; and foreign governments, depending on the spill location and resources affected.

Not all spills require a NRDAR, and there are no quantitative thresholds for initiating NRDAR (e.g., no minimum amount of spilled product, no requirement for USCG involvement, and no prerequisite for shoreline impacts). NRDAR Trustee Representatives decide if and when to initiate NRDAR based on the nature of the spill and its actual or potential impacts to natural resources under their jurisdictions.

If an Incident Command is established for a spill with NRDAR concerns, NRDAR Trustee agencies may collectively appoint a NRDAR Liaison (see the USCG [Incident Management Handbook](#)) to represent the NRDAR team in the Incident Command Post and serve as a conduit for information to/from the Incident Command. However, NRDAR activities are conducted under separate authority and funding from response activities, and the OSCs do not direct the NRDAR. NRDAR Trustees and Incident Command

personnel are expected to fully coordinate and share resources and information to maximize efficiencies and reduce duplication. While NRDAR activities may overlap with the response activities, NRDAR activities shall not interfere with response activities. NRDAR field activities, particularly vessel or aircraft use, must be coordinated with the Operations Section to ensure crew safety as well as site security, and there may also be an obligation for NRDAR Trustees to consult under Section 106 of the National Historic Preservation Act if ground-disturbing NRDAR activities are proposed. Costs associated with NRDAR are tracked and addressed separately from response costs. NRDAR studies and restoration efforts often continue beyond the conclusion of emergency response activities.

NRDAR data and sampling needs may include (note that this is not a comprehensive list):

- Locations and trajectories of spilled oil or hazardous substances.
- Samples of oil or hazardous substances from the spill source.
- Samples of oil or hazardous substances in environmental media.
- Blood, tissue, or other samples from impacted resources.
- Locations and numbers of impacted fish and wildlife.
- Locations of natural resources at risk of being impacted or disturbed by response activities.
- Type, magnitude, and duration of impacts to natural resources.

Incident Command may collect some of these data for its own purposes, and the NRDAR team would request that the Incident Command share these data, thereby reducing costs and duplication of efforts. If sufficient data are not collected to support NRDAR goals, the NRDAR team may deploy field staff to collect data independently from response activities. Typical NRDAR field activities may include systematic carcass searches and collections, environmental media sampling (pre- and post-impact), habitat characterization, biota abundance assessments, human use assessments, and aerial wildlife surveys.

Information sharing between response and NRDAR teams helps to minimize injuries to natural resources and human use of those resources. Further, coordination of response and NRDAR efforts maximizes the likelihood of successful resource protection, mitigates resource injuries, and maximizes restoration of natural resources. Information sharing avoids duplication of efforts and expenses; maximizes efficient use of staffing, equipment, and data; and avoids conflicts, misunderstandings, and interference in ongoing operations.

Helpful links:

- *Natural Resource Damage Assessment and Restoration Primer for Federal, State and Tribal trustees, Federal On-Scene Coordinators, and Others Involved In Preparedness and Emergency Response Activities under the National Oil and Hazardous Substances Pollution Contingency Plan, CERCLA, OPA and Other Authorities*, available on the DOI [Restoration Program](#) web page.
- NOAA Office of Response and Restoration [Natural Resource Damage Assessment](#) web page.

2510 – Coordinating Carcass Collections

Both Unified Command and the NRDAR Trustees have two goals in removing incident-related carcasses from the environment—minimizing secondary contamination of scavengers or as evidence of environmental harm. The search methods necessary for minimizing secondary contamination via scavenging of oiled carcasses is different from accumulating evidence of environmental harm (e.g., incidental discovery vs. stratified random systematic sampling, respectively). The two goals also require different levels of documentation when a carcass is removed from the environment, and the ultimate

1 disposition of the collected carcass may also be different (although, during an incident, carcasses are
2 stored at the morgue). Therefore, it is critical that Unified Command and NRDAR Trustees fully
3 coordinate any carcass collection plans as early in the incident as possible.

4 Early and full coordination between Incident Unified Command and the NRDAR team will:

- 5 • Reduce duplication in carcass search activities;
- 6 • Enable efficient allocation of response and NRDAR field teams;
- 7 • Allow identification of opportunities for collaboration and sharing of resources in the field,
8 ultimately reducing costs for all involved;
- 9 • Allow for development of data collection and sharing agreements; and
- 10 • Coordinate and consolidate carcass storage and disposition.

11 It is the OSC's responsibility to facilitate coordination between Unified Command staff and the NRDAR
12 team. The OSCs must ensure that the NRDAR Trustees, preferably via the NRDAR Liaison, are notified
13 when the need for a carcass collection plan is identified for an incident. The NRDAR team will identify
14 the appropriate staff from the affected NRDAR trustee agencies to work with Unified Command staff to
15 coordinate incident-specific processes for carcass search and collection.

3000 – OPERATIONS

3600 – WILDLIFE

3610 – Wildlife Response Best Management Practices (BMPs)

Best Management Practices (BMPs) should be followed for every spill response. These include:

1. Watch for, and avoid collisions with, wildlife, and report all distressed or dead birds, marine mammals, fish, and other wildlife to Wildlife Branch or supervisor.
2. Avoid disturbing vegetation and shorelines with foot traffic, boats, and equipment. Consult wildlife agency representatives in the Wildlife Branch or Environmental Unit if disturbance cannot be avoided.
3. All onshore work should be conducted during daylight hours, if possible, except within 24 hours of projected oil landfall. If night operations are necessary, confine operations to landward of the intertidal zone.
4. Use existing access and egress areas and roadways.
5. Use low-pressure tire vehicles (e.g., all-terrain vehicles or side-by-side) or consult with wildlife agency representatives in the Wildlife Branch or Environmental Unit to minimize impact.
6. Minimize removal of clean (unoiled) sediments.
7. Adhere to incident-specific flight restrictions over sensitive habitats and avoid hovering or landing aircrafts in these areas.
8. Adhere to flight altitude restrictions over wildlife management areas and other managed lands.
9. If marine mammals or birds become trapped or entangled in boom, anchor lines, or other response equipment, notify wildlife agency representatives for instructions.
10. Install and monitor underwater equipment or booms to prevent entrapment of fish and wildlife.
11. Do not block major egress points in channels, rivers, passes, and bays.
12. Include documentation and possibly collection of dead animals, following incident-specific collection and reporting procedures, in plans for *in situ* burning.
13. Staging areas and waste collection areas should be examined, and land management agencies (e.g., Alaska Department of Natural Resources (ADNR)) consulted, for the presence of historical properties, cultural resources, and biological resources prior to establishment. Support infrastructure should be located away from sensitive habitats, including shorelines, scrub, riparian habitat, and other vegetated areas.
14. All heavy equipment use should be as low on the beach as possible and avoid the high tide or wrack line while conducting clean-up activities. Keep heavy equipment away from the wrack line unless the wrack line is oiled.
15. Activities that require removal of riparian, forested, scrub, shrub, or other vegetated habitat should be minimized.

16. If bears are observed during staging activities, contact supervisor, Safety Officer, or Environmental Unit.
17. Remove trash from work areas on a daily basis to avoid attracting wildlife.
18. Stakes or flagging that preceded the spill and response activities should not be removed or destroyed.
19. Work with Operations and Planning Sections to mitigate impacts to subsistence activities from response activities.
20. Use a properly screened water intake to avoid impacts to fish, especially juvenile or small resident fish. The intake should be centered with a screened enclosure to reduce the potential for fish to be entrained, impinged, or injured. Contact ADF&G for recommendations on screen mesh sizes and minimum water velocity depending on the location and timing of water withdrawal activities.
21. Avoid transporting or introducing invasive species.

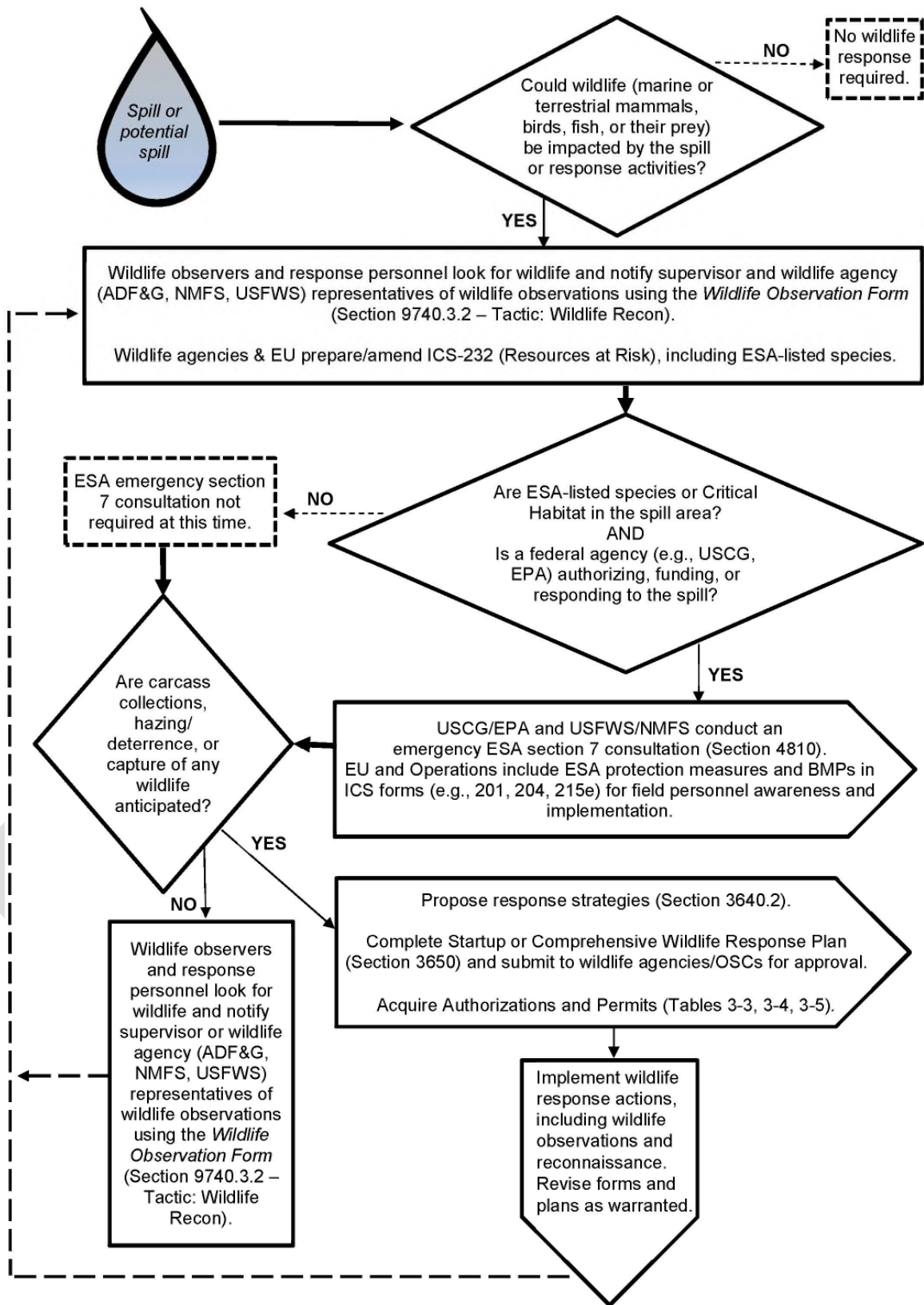
3620 – General Wildlife Protection Considerations

Response activities can have direct and indirect impacts to wildlife, including injury and death. Wildlife agency representatives can provide recommendations to the Federal and State OSCs to minimize adverse impacts to wildlife from response activities. General wildlife protection considerations are listed below; additional information regarding each one is available in [Section 4610.3](#):

- Prevention of Introduction of Rats to “Rat Free” Islands
- Prevention of Unnecessary or Illegal Disturbance to Sensitive Species and Habitats
- Prevention of Potential Injury and/or Disturbance to Bears
- Prevention of the Collection of Wildlife Parts for Personal Use
- Prevention of Wildlife Exposure to Shoreline Treatment Chemicals

Use Figure 3-1: Wildlife Response Flowchart, for major wildlife response decisions, agency notifications, and initial forms.

1 Figure 3-1: Wildlife Response Flow Chart.



2

3630 – Vessel Grounding or Sinking Response

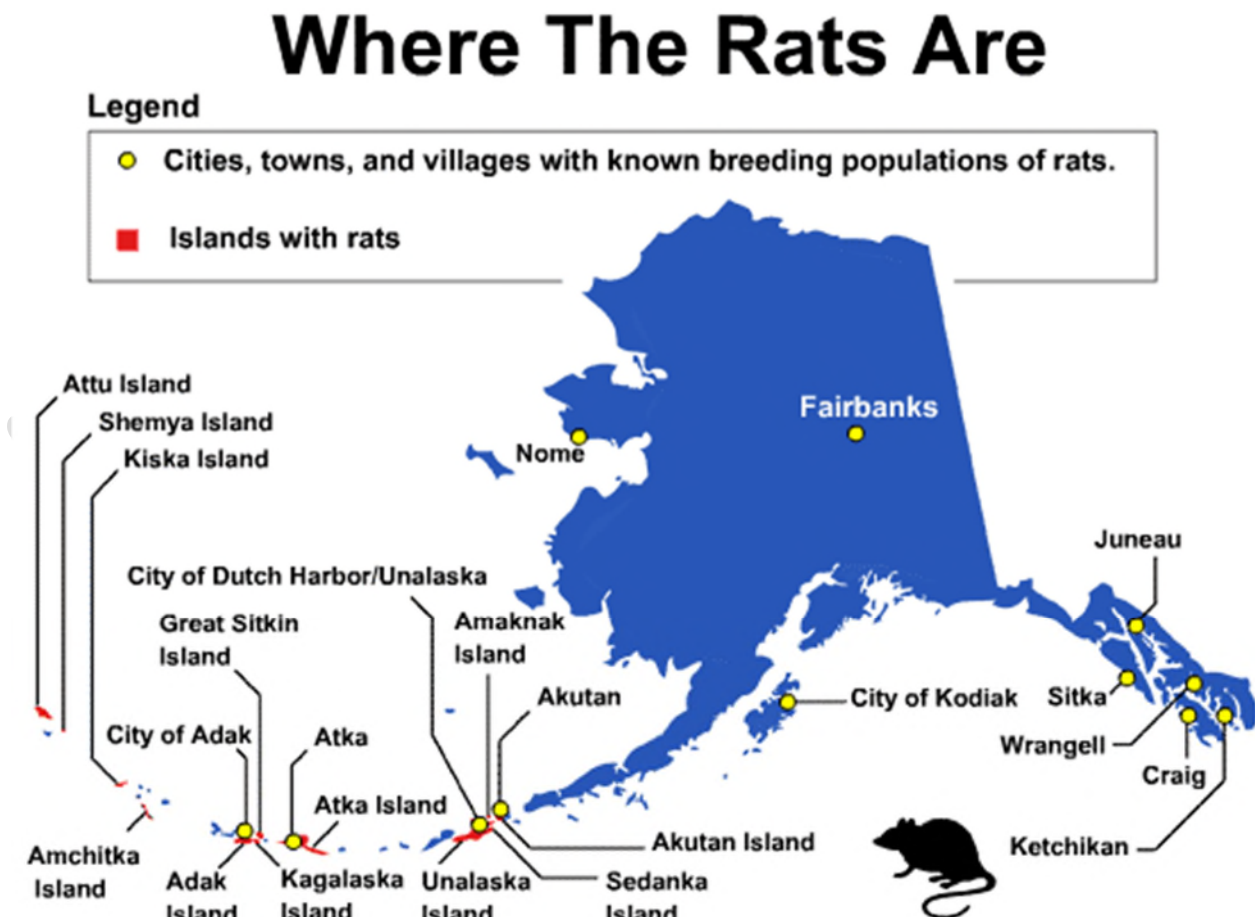
In addition to creating a potential spill, the sinking or grounding of vessels present unique challenges for wildlife protection. Response activities should prevent rat introduction to Alaska’s “rat-free” islands; avoid marine animal entanglement; prevent the spread of invasive species other than rats; properly dispose of catch that may be contaminated by oil or spoilage; and avoid impacts to wildlife or sensitive habitats during vessel removal, salvage, or scuttling.

Response personnel can use the *Checklist: Vessel Grounding or Sinking Response* in [Section 9740.3.4](#) as an aid to protect wildlife during vessel groundings and sinkings.

3630.1 – Preventing Rat Introduction to Alaska’s Rat-Free Islands

State of Alaska law (5 AAC 92.141) prohibits the transport, harboring, or release of live Muridae rodents, which include the Norway rat (*Rattus norvegicus*), the roof rat (*R. rattus*), and the house mouse (*Mus musculus*). The Norway rat is typically of greatest concern because they are widely distributed (Figure 3-2) and are excellent swimmers.

Figure 3-2: Location of Known Breeding Populations of Rats in Alaska.



Source: ADF&G [Invasive Species – Norway Rat \(*Rattus norvegicus*\)](#) web page.

Few of Alaska's remote islands have rats (Table 3-1). Invasive rats are a significant concern for islands in the Alaska Maritime NWR and in the Pribilof Islands because of the devastation introduced rats can have on island ecosystems, including direct predation of nesting seabirds and endemic songbirds, and the introduction of disease to hauled-out marine mammals and other terrestrial mammals. Nesting seabirds, especially endemic species, are vulnerable to impacts from rats because of how seabirds reproduce: they nest primarily on the ground or in burrows, and adult foraging behavior leaves eggs and young unattended for several hours to days. Rats are extremely difficult and expensive to eradicate after they are established on an island or at a remote location.

Table 3-1: Islands in the Alaska Maritime National Wildlife Refuge (NWR) Known to Have Rats
(All other islands in the Alaska Maritime NWR should be considered to be rat free.)

Fox Islands	Andreanof Islands	"Rat" Islands	Near Islands
Unalaska	Adak	Kiska	Attu
Amaknak	Great Sitkin	Amchitka	Shemya
Akutan	Kagalaska		
Sedanka	Atka		

All vessels operating in Alaska should follow the *Rat Prevention Guidelines for Vessels* in [Section 9740.3.5](#). Even with these guidelines, rats can access shorelines from grounded vessels or vessels sinking close to shore, and rats can drift to shore on vessel debris. Stricken vessels should be examined for rats, if it is possible and safe to do so. Response vessels or aircraft could also inadvertently transport rats to rat-free areas, and they should be examined for rats before deployment. In addition to the [Rat Prevention Guidelines for Vessels](#), the USFWS and ADF&G can provide guidance and assistance in finding resources to examine boats and planes for rats.

If it is not possible to conduct onboard rat inspection and prevention activities for either a stricken vessel or a response vessel, USFWS and ADF&G representatives will develop an incident-specific rat prevention plan for approval by the OSCs. The plan should include, but not be limited to, the deployment of rat trap and poison stations in appropriate locations on the vessel and the island, names of individuals authorized to deploy and monitor the stations, and a station monitoring plan.

Additional information on rats, including ways to prevent their introduction, can be found on the following web pages:

- ADF&G [Invasive Species — Norway Rat \(*Rattus norvegicus*\)](#)
- USFWS Alaska Maritime NWR [Keep a Rat-free Ship!](#)
- StopRats.org [Rats on Boats](#)

3630.2 – Entanglement and Fishing Gear

A grounded or sunken fishing vessel with nets deployed in the water, or any vessel with lines, can entangle and harm wildlife, especially marine mammals, diving birds, fish, and shellfish. Efforts should be made to remove nets from the water as soon as possible. Not only will unattended nets left in the water ("ghost nets") continue to entangle fish in perpetuity, but as fish or shellfish become entangled, they will become attractants to other wildlife. Air-breathing wildlife, such as marine mammals and birds, could subsequently become entangled in nets. Entanglement may cause lacerations, exhaustion, starvation, and drowning of wildlife.

Although fixed gear, such as longlines and pots, is less likely to entangle fish due to biodegradable line requirements, it can still entangle wildlife. This gear should be retrieved whenever possible. Observations of entangled wildlife during a spill response should be immediately reported to the following numbers:

Whales, seals, sea lions, porpoises:	NMFS Marine Mammal Stranding Network Hotline (877) 925-7773 or (877) 9-AKR-PRD
Walrus, sea otters, polar bears, or birds:	USFWS Alaska Region Spill Response Team (907) 242-6893 or fwsakspillresponse@fws.gov

If entangled whales, seals, sea lions, or porpoises are observed in a situation other than during a spill response, please report it to the NMFS Marine Mammal Stranding Network Hotline, (877) 925-7773. If entangled walrus, sea otters, or polar bears are observed in a situation other than during a spill response, please report the observation to USFWS Marine Mammals Management, (800) 362-5148. If entangled birds are observed in a situation other than during a spill response, please report this to USFWS Sick or Dead Bird Hotline, (866) 527-3358.

3630.3 – Disposal of On-Board Catch

Commercial fishing vessel on-board catch can become unsafe for human consumption if, for example, catch is contaminated (e.g., from a leak in a hydraulic line into a fish hold) or spoiled (e.g., from a power loss that affects refrigeration).

Contaminated or potentially contaminated catch must be reported to, and may be subject to inspection by, the ADEC Food Safety and Sanitation Program, which has broad statutory authority (AS 17.20) over food offered to the public or sold. Additional regulations support a Zero Tolerance Policy for any contamination of food processed in Alaska. See *Ensuring Food Safety Following an Oil Spill in Alaska: Regulatory Authorities and Responsibilities*, available on the Oil Spill Recovery Institute [Available Reports](#) web page, for more information. Food may also require inspection before the ADEC Wastewater Program will authorize disposal in state waters.

Oil-contaminated catch may not be disposed of at sea. Disposal in “ocean waters”⁵ is not allowed under the Marine Protection, Research, and Sanctuaries Act (MPRSA) and its accompanying EPA regulations, which prohibit ocean disposal of oil of any kind or in any form except in trace amounts. Disposal of chemically contaminated food items may also violate the Clean Water Act and international treaties, such as the International Convention for the Prevention of Pollution from Ships. The Unified Command will ensure the proper handling and disposal of contaminated catch at permitted landfills, at disposal facilities outside of Alaska, or other locations approved by ADEC.

Catch that is not contaminated by oil may potentially be disposed of in the water, depending on the circumstances. Contact the EPA Alaska Operations Office, (907) 271-5083, if disposal is proposed for MPRSA-defined ocean waters. Wildlife agencies can provide valuable information on where and how

⁵ “Ocean waters” means those waters of the open seas lying seaward of the base line from which the territorial sea is measured, as provided for in the Convention on the Territorial Sea and the Contiguous Zone (15 UST 1606; TIAS5639). Ocean waters can be viewed on the [Alaska DEC Seafood Processing Webmap](#) by activating the “NOAA Baseline/Baselines Closing Lines” layer.

catch should be disposed of at sea to minimize unintentional harm to wildlife and habitat. For example, disposal during commercial fishing operations or in Steller sea lion foraging areas should be avoided.

3630.4 – Preventing Spread of Invasive Species Other than Rats

Invasive species can harm ecosystems in a variety of ways. They can 1) displace, outcompete, and prey on native species, 2) foul infrastructure, and 3) cause diseases in humans. Invasive species can be transported and introduced by vessel groundings, hull-fouling, marine debris, and ballast water. Personal gear and equipment used during response efforts can also inadvertently transport invasive “hitchhikers” to the scene.

The introduction and spread of invasive species during spill response can be prevented by following these BMPs:

1. **ASSESS** the distribution of invasive species in the area of concern.
 - a. Before heading out, consult the Alaska Exotic Plants Information Clearinghouse ([AKEPIC](#)) and the NOAA Fisheries [Aquatic Invasive Species in Alaska](#) web pages to determine if there are already invasive animal or plant species present.
 - b. Determine BMPs to prevent introduction or mitigate spread of present or potential invasive species.
2. **REPORT** any suspected or confirmed invasive species to your supervisor, who should report them to the following natural resource agencies:
 - a. ADF&G via
 - i. Phone (1-877-INVASIV or 1-877-468-2748),
 - ii. Email (dfg.dsf.InvasiveSpecies@alaska.gov), or
 - iii. Online at the ADF&G [Invasive Species Reporter](#) web page.
 - b. The appropriate land management agency contact (see Table 3-2).
3. **Reports should include:**
 - a. Location (Global Positioning System (GPS) coordinates if possible), and
 - b. Photos (to aid identification).

Table 3-2: List of Agency and Land Management Contacts for Reporting Suspected or Confirmed Invasive Species in Alaska.

Agency	Title	Name	Contact Information
Alaska Department of Fish and Game	Invasive Species Program Coordinator	Tammy Davis	tammy.davis@alaska.gov (907) 465-6183
Alaska Department of Natural Resources	Invasive Weeds & Agricultural Pest Coordinator	Dan Coleman	Daniel.coleman@alaska.gov (907) 754-8721
Bureau of Indian Affairs	Natural Resource Manager	Keith Kahklen	keith.kahklen@bia.gov (907) 586-7618

Agency	Title	Name	Contact Information
Bureau of Land Management, Alaska State Office	Forestry Program Lead	Eric Geisler	egeisler@blm.gov (907) 271-1985
National Marine Fisheries Service	Wildlife Biologist	Linda Shaw	Linda.shaw@noaa.gov (907) 586-7510
National Park Service	Invasive Plants Coordinator	Chris Overbaugh	chris_overbaugh@nps.gov (907) 664-3452
U.S. Fish and Wildlife Service	Regional Invasive Species Coordinator	Aaron Martin	aaron_e_martin@fws.gov (907) 378-0568 or (907) 786-3510
U.S. Forest Service	Invasive Plant Program Coordinator	Betty Charnon	betty.charnon@usda.gov (907) 743-9456

Federal and State OSCs, RP/PRPs, on-the-ground responders, and overflight observers are requested to notify natural resource agencies of potential sources of invasive species (e.g., the release of ballast water collected in a different location). Examples of BMPs recommended by natural resource agencies include:

- Inspecting marine debris for invasive species,
- Securing impacted vessels that have fouled hulls or rats, and
- Maintaining clean, hitchhiker-free response equipment (e.g., tents, boats, go-bags, and personal gear).

Multiple state and federal laws are in place to prevent the introduction of invasive species. More information on specific invasive species in Alaska and BMPs to prevent their spread can be found on the following web pages:

- ADF&G [Invasive Species](#)
- Alaska Exotic Plants Information Clearinghouse ([AKEPIC](#))
- NOAA Fisheries [Aquatic Invasive Species in Alaska](#)
- ADNR [Invasive Plant and Agricultural Pest Management](#)
- USFWS Alaska Region [Invasive Species](#)

3630.5 – Preventing Impacts to Wildlife and Habitats during Vessel Removal, Salvage, or Scuttling

Intentional ocean disposal of vessels by sinking at sea (scuttling) should only be considered when land-based alternatives are not feasible. The MPRSA requires consideration of land-based alternatives prior to authorization of ocean disposal. Federal requirements for the disposal of vessels at sea, including the notification process, required removal of pollutants, disposal site selection, and recording of the vessel location on nautical charts, are summarized on the EPA [Disposal of Vessels at Sea](#) web page.

Vessel scuttling and salvaging tactics can affect wildlife and habitat. For example, detonations or metal-on-metal impacts can have a sound source level that exceeds in-water or in-air acoustic thresholds (i.e., noise levels) of concern, particularly for marine mammals. Acoustic and other stressors are of particular concern when they occur near known concentrations of sensitive species (e.g., near Steller sea lion or

harbor seal haulouts). Some locations are not suitable for scuttling due to their sensitivity or vulnerability (e.g., seamount habitats for rare deep water corals or designated critical habitat of ESA-listed species). Vessel salvage could occur in areas with high concentrations of wildlife or during critical biological periods (e.g., nesting, breeding, pupping). Coordinate with wildlife agency representatives to identify, mitigate, or avoid incidental stressors to wildlife or habitat from vessel scuttling or salvaging.

3640 – Wildlife Branch⁶

Coordination of wildlife response activities (including reconnaissance, carcass collection, hazing/deterrence, capture, and care) usually occurs within the WB, which works within the Operations Section. Some additional actions that are related to wildlife or can help inform wildlife response efforts occur with the EU of the Planning Section ([Section 4600](#)).⁷ Under the direction of the Wildlife Branch Director (WBD), the principal objectives of the WB are to:

- Conduct all operations in a safe manner for people and animals.
- Respond to oiled or otherwise injured wildlife.
- Minimize injuries to wildlife and habitats from the contamination.
- Minimize injuries to wildlife and habitats from the cleanup effort.
- Collect all data, samples, and wildlife in a legally defensible manner.
- Document for the Unified Command (and potentially others) the immediate impacts to wildlife from the oil spill and cleanup.
- Report to the Unified Command (via the Operations Section Chief), in a timely and complete manner, all pertinent data and information necessary to ensure clarity of wildlife operations.
- Support the efforts of the Joint Information Center (JIC) in disseminating information (much of which may be real-time) to the media, public and other interested parties.
- Provide the best achievable care to impacted wildlife.

To ensure these objectives are achieved with maximum efficiency, the WBD (in coordination with the EU) coordinates the activities of the federal, state, and local agencies along with commercial and non-profit organizations involved in wildlife response who fall under the authority of the Unified Command during spill response. Early development and implementation of a wildlife response plan (WRP) ensures timely mobilization of dedicated staff, equipment, and facilities. The wildlife response effort should be flexible and scalable to the size of the oil spill; only those positions necessary and appropriate for a specific incident are filled. Wildlife contractors may be deployed, depending on the region and risk.

Once the Unified Command activates the WB, several components of wildlife response can be initiated, including reconnaissance to determine species and areas at greatest risk; feasibility of wildlife hazing/deterrence; search and collection for live and dead animals; treatment and rehabilitation of oil-exposed wildlife; and release and monitoring of rehabilitated wildlife.

⁶ Adapted from the NMFS *Pinniped and Cetacean Oil Spill Response Guidelines*, available on the [NOAA Institutional Repository](#).

⁷ For example, identification of resources at risk; assessment of National Historic Preservation Act section 106 properties that may be affected by wildlife response activities; ESA section 7 consultation; MMPA considerations; geographic information system (GIS) and mapping; providing trained wildlife observers on response vessels; and conducting shoreline assessment.

3640.1 – Wildlife Reconnaissance (Recon)

Wildlife Recon is initiated before any other wildlife protection strategies ([Section 3640.2](#)) and is continued in concert with those strategies. The “grab-and-go” *Tactic: Wildlife Reconnaissance (Recon)* is available in [Section 9740.3.1](#). It is the WBD’s or RP/PRP’s responsibility to understand and implement the necessary coordination with wildlife agencies for proper application of the tactic. If no WB is established, the Unified Command must coordinate with the EU to ensure sufficient wildlife recon occurs. A permitting summary is provided in [Section 3640.1.1](#).

Wildlife observations provide the baseline data necessary for an effective and efficient response. They can:

- Guide overall incident response priorities.
- Identify sensitive areas and species in need of protection.
- Provide key information to help keep oil away from wildlife and wildlife away from oil.
- Minimize the direct impacts of spills and response actions to wildlife species.
- Reduce incidental response action impacts to wildlife by informing vessel and equipment operators about wildlife locations and reducing strike or entanglement risks.
- Guide planning for wildlife response activities, such as carcass collection, hazing/deterrence, and capture and rehabilitation of oiled wildlife.

Wildlife recon can be performed by **any spill responder**, especially in the first 24 to 48 hours (before dedicated wildlife responders usually arrive on scene). Dedicated **Wildlife Observers** will be deployed based on spill conditions, location, and species likely to be present. Anyone can use the *Wildlife Observation Form* ([Section 9740.3.1](#)) to record and summarize observations.

In the first hours of a spill, all responders can report birds, marine mammals, or terrestrial animals —any information will be helpful. Try to include:

1. **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales, 5 seals)
2. **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out, floating/sitting in the water, transiting in a northerly direction)
3. **Where are they?** (preferably latitude/longitude or, e.g., “nearshore/shoreline approximately 1 kilometer from oil, in [name of] Bay”)
4. **Other relevant details** (e.g., degree of oiling).
5. **Photos and video** are helpful.

Wildlife Observers, a specific position within Incident Command, will follow an incident-specific wildlife observation protocol, generally developed through Unified Command by the wildlife agencies. The *Tactic: Wildlife Reconnaissance (Recon)* ([Section 9740.3.1](#)) is a generic protocol that can be adapted for specific incidents. Incident-specific protocols should be scaled appropriately for the size and location of the incident and should include more detail on species most likely to be in the area and ESA-listed or other protected species. The skills and duties of Wildlife Observers differ from those of wildlife recon personnel and all other responders. Wildlife Observers must:

1. Be proficient at identifying marine and terrestrial mammals and birds *to species* (or species group for some birds) for species likely to be in the area, especially ESA-listed wildlife.

2. Not be assigned any other duties, such as Shoreline Cleanup Assessment Technique (SCAT) teams, maintaining boom, or overseeing skimming operations.

A Wildlife Observer's sole duty is to observe, record, and report information on wildlife.

3640.1.1 – Authorizations and Permits for Wildlife Recon

No specific permits are needed for incidental wildlife observations made by responders. Wildlife Observers following incident-specific protocols (e.g., survey track lines) may need permits in the case of incidental disturbance of protected species, such as hauled-out harbor seals (see Table 3-3 and Table 4-1). In all cases, avoidance of unnecessary disturbance to wildlife while conducting surveys is important and must be included in incident-specific protocols. Use of unmanned aerial systems (drones) and other types of remote monitoring often require different types of permits, authorizations, and procedures and, therefore, are not covered in this version (2020) of the WPG.

3640.2 – Wildlife Protection Strategies

Wildlife protection during oil spill response is categorized into three basic strategies, summarized as follows:

- **Primary Strategy: Keep the spilled oil away from wildlife and their habitats** – Controlling the release and spread of spilled oil and removal of oiled debris, including oiled carcasses, from the environment.
- **Secondary Strategy: Keep wildlife away from spilled oil** – Hazing/deterring wildlife from oiled areas to clean areas, and pre-emptive capture, handling, transport, and release of unoiled wildlife.
- **Tertiary Strategy: Respond to impacted wildlife** – Capture, handling, transport, cleaning, rehabilitation, holding, and release of oiled or injured wildlife.

Primary response strategies for protecting wildlife emphasize controlling the release and spread of spilled oil to prevent or reduce contamination of wildlife and their habitats. Primary response strategies can include mechanical cleanup, protective booming, *in situ* burning, and dispersant use. Primary response strategies also include the removal of oiled debris, particularly contaminated food sources (such as oiled wildlife carcasses) in water and on land.

Secondary response strategies emphasize hazing or keeping wildlife away from oiled areas using deterrent techniques. Secondary response strategies also include the pre-emptive capture and subsequent handling, transportation, short-term holding, and release of unoiled wildlife.

Tertiary response strategies are “last resort” strategies, and include capture, handling, transporting, rehabilitating, and holding of oiled wildlife, and releasing rehabilitated wildlife.

Additional information regarding the primary, secondary, and tertiary wildlife response strategies for individual species or species groups is in [Section 9740.2](#).

The WPG focuses on wildlife resources at risk due to an oil spill in offshore and coastal waters and along the Trans-Alaska Pipeline System, including migratory birds, marine mammals, terrestrial mammals, and aquatic resources. Migratory birds discussed in the WPG include waterfowl, seabirds, diving birds, shorebirds, raptors, and selected species of upland birds. Marine mammals include sea otters, pinnipeds, cetaceans, and polar bears. Terrestrial mammals include bears, ungulates, wolves, and furbearers. Aquatic resources include fish and shellfish. See [Section 9740.2](#), Table 9-3, Table 9-4, and Table 9-5 for species of concern in different geographic zones.

3640.2.1 – Primary Response Strategies

Primary response strategies may require permits or authorizations from wildlife agencies. Obtain or verify proper authorizations and permits (Table 3-3) prior to strategy implementation.

3640.2.1.1 – Carcass Collection and Documentation

The grab-and-go *Tactic: Collection of Small Carcasses and Documentation of Large Carcasses* is in [Section 9740.3.2](#). It is the WBD's and RP/PRP's responsibility to understand and implement the necessary coordination with wildlife agencies ([Section 3650](#)) and obtain needed authorizations and permits ([Section 3640.2.1.1.2](#)).

Remove oiled and unoled carcasses in the spill area as soon as possible to avoid attracting or contaminating scavengers, such as eagles and bears. Oiled wildlife carcasses will need to be collected in a legally defensible manner, as outlined or referenced in this section, to document impacts to wildlife from a spill and for law enforcement and NRDAR purposes. Carcasses may only be collected by wildlife agencies or parties permitted by those agencies; some species also require additional agency authorization ([Section 4610.5.1](#); Figure 4-1). Authorizations are given only on an incident-specific basis.

The *Tactic: Collection of Small Carcasses and Documentation of Large Carcasses* ([Section 9740.3.2](#)) is a generic protocol that can be adapted for specific incidents. Incident-specific carcass collection protocols may be developed through Unified Command or the NRDAR trustees, in coordination with wildlife agencies. Incident-specific protocols should be scaled appropriately for the size and location of the incident and should address species likely to be encountered and protected species. Completed protocols must be approved by wildlife agencies and the Federal and State OSCs, with concurrence of the NRDAR Trustees whose trust resources are proposed for collection.

Incident-specific carcass collection protocols must address, at minimum, the following information:

- How will oiled carcasses be reported to Unified Command and wildlife agencies (e.g., are collection teams actively searching areas; will carcasses be reported through opportunistic field observations)?
- Who will retrieve oiled carcasses (e.g., contractors, wildlife agency staff, oil spill removal organizations (OSROs)/primary response action contractors (PRACs)?
- What equipment will be used; where is it stored; how will it get to the field?
- How will carcasses be transported from the field, and where will they be transported to?
- How and where will carcasses be stored until transferred to wildlife agencies (e.g., freezer space, refrigerator, coolers at staging area)?
- Where will a morgue be set up, and how will it be maintained?

Carcasses must be reported to supervisors and Unified Command but not collected when:

- Carcass collection cannot be done safely.
- Field responders do not have permits, authorization, protocols, or supplies.
- It is not feasible given other, more immediate, job responsibilities.
- A carcass is too big to collect (e.g., large terrestrial or marine mammals).

To report a carcass, provide (at a minimum):

- Observer name, time, date, and location (latitude/longitude and location description).
- Species or species groups and numbers of each.

- Estimated degree of oiling and location of carcass relative to known oiled area.
- Photographs, if possible.

3640.2.1.1.1 – Collection and Documentation of Large Carcasses

Large carcasses (such as whales and bears) might not be feasible to remove from the field, but the collection or processing of all large carcasses, oiled or un-oiled, is important for an effective wildlife response and to determine the cause of death. The animal may be necropsied in the field and samples collected from the carcass. Wildlife agency representatives will make incident-specific decisions about sampling or collection of large carcasses. The decisions made will depend upon the species, degree of oiling, location relative to scavengers, proximity to transport, safety, size of carcass, and field disposal methods for oily waste. Information on sampling protocols is in [Section 3640.2.1.1.2](#).

For detailed protocols, authorized marine mammal responders will refer to the NMFS *Arctic Marine Mammal Disaster Response Guidelines* or *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, available on the [NOAA Institutional Repository](#). Sampling of other large carcasses during a spill will generally follow the same guidelines.

3640.2.1.1.2 – Authorizations and Permits for Carcass Collection

Incident-specific **authorization** to collect carcasses or samples from carcasses AND **permits** to possess carcasses are required before carcasses are collected (Table 3-3). If carcasses are expected to be found, obtain authorizations and permits early in a response rather than waiting until carcasses are observed. Agency authorizations for carcass collection will depend on factors such as accessibility of the spill location, species impacted or likely to be impacted, availability of responders and agency staff, and the legal status of impacted species (e.g., ESA-listed). In general:

- **USFWS** Office of Law Enforcement (OLE) will provide incident-specific authorization for carcass collection of USFWS-managed species (migratory birds, ESA-listed birds, eagles, sea otters, walruses, and polar bears). This is coordinated by the USFWS Spill Response Coordinator or agency representative. USFWS will also issue permits to collect carcasses of the species under their management authority.
- **NMFS** will authorize members of the Marine Mammal Stranding Network to collect or sample carcasses whenever possible. If NMFS staff or the NMFS Stranding Response Program are unable to sample or collect carcasses, verbal or written approval from the NMFS Marine Mammal Health and Stranding Response Program (MMHSRP) Permit co-investigators is required for any other individual to collect or sample carcasses.
- **ADF&G** will issue permits for collecting carcasses of terrestrial mammals, non-migratory birds, fish, shellfish, and invertebrates.

Landowner permits, authorizations, or permission may be required to access upland areas and submerged lands or to cross property boundaries.

Responders may apply for authorization and permits to collect carcasses by completing a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) and submitting it to the wildlife agencies and OSCs for consideration.

Table 3-3: Wildlife Authorizations and Permits for Primary Response Strategies.

Strategy or Tactic	Permit or Authorization Needed...	Agency and Species	Permit or Authorization	Additional Considerations
ALL (e.g., mechanical recovery, boom deployment, on-water recovery, non-mechanical recovery, etc.)	If a federal agency (e.g., USCG, EPA) funds, authorizes, or conducts a response that includes activities that are potential stressors AND overlap in time and space with ESA-listed species.	NMFS – whales, porpoises, seals, sea lions, and marine fish USFWS – birds, sea otters, and polar bears	Emergency ESA Section 7 Consultation A federal action agency consults with NMFS and USFWS to mitigate and authorize take of ESA-listed species that may be impacted by spill response activities.	Whenever possible, NMFS and USFWS will combine the initial consultations into one document for efficient incorporation into other response activities.
	If marine mammals are likely to be present.	NMFS - whales, porpoises, seals, and sea lions USFWS - sea otters, walrus, and polar bears	MMPA Authorization The MMPA allows federal, state, or local government officials or employees to humanely take marine mammals in the course of his or her duties as an official or employee if such taking is for: 1) the protection or welfare of the mammal, 2) the protection of the public health and welfare, or 3) the nonlethal removal of nuisance animals. Non-government personnel can be authorized to humanely take marine mammals by NMFS and USFWS under MMPA Section 112(c) during an incident.	Non-government personnel can be authorized by NMFS MMHSRP personnel to harass species under NMFS's jurisdiction. That harassment must be approved on an incident-species basis and reported. A specific MMPA Letter of Authorization (LOA) for non-government personnel to take sea otters, walrus, and polar bears is required and can be obtained expeditiously from the USFWS via the USFWS Spill Response Coordinator during an incident, or as part of the spill response planning process.
Boom in freshwater fish-bearing water bodies	If boom or anchors are placed in freshwater or above mean lower low tide elevation in anadromous water bodies, or if boom may impede fish passage.	ADF&G	Title 16 Fish Habitat Permit	ESA-listed species or other marine mammals may be feeding in streams and could be unintentionally harassed by deployment of, or become entangled in, boom. These possibilities may require an ESA section 7 consultation and MMPA authorization from NMFS and USFWS.

Strategy or Tactic	Permit or Authorization Needed...	Agency and Species	Permit or Authorization	Additional Considerations
Removal of oiled carcasses	Always	<p>USFWS - migratory birds, sea otters, walruses, polar bears</p> <p>ADF&G - terrestrial mammals, non-migratory birds, fish, invertebrates, aquatic plants</p> <p>NMFS - whales, porpoises, seals, sea lions</p>	<p>USFWS - Incident-specific OLE Authorization for all USFWS species; Migratory Bird Salvage Permit for migratory birds; ESA Section 7 consultation for ESA-listed species; MMPA Section 112(c) authorization for marine mammals (non-government personnel only).</p> <p>ADF&G - Wildlife Response Permit or Aquatic Resource Permit (varies by species).</p> <p>NMFS - The NMFS Stranding Response Program holds an existing permit that authorizes personnel covered by the permit to collect oiled carcasses. Authorized NMFS personnel (NMFS Regional Stranding Program Coordinator and associated co-investigators) can provide verbal authorization to others to collect oiled carcasses.</p>	Carcasses must be recorded, reported, and collected or sampled according to protocols outlined in Section 3640.2.1.1 (Carcass Collection and Documentation) and Section 9740.3.2 (Tactic: Collection of Small Carcasses and Documentation of Large Carcasses) , OR an agency-approved incident-specific Wildlife Response Plan or Carcass Collection Plan.
Dispersants	Will be reviewed according to protocols outlined in the <i>Alaska RCP</i> (Part 3. A. Chemical Dispersants).			Any activity that overlaps in time and space with ESA-listed species and may affect individual animals (e.g., noise, ship strike, dispersants, or other harm or harassment) should be authorized by an ESA Section 7 consultation.
<i>In situ</i> burning	Will be reviewed according to protocols outlined in the <i>Alaska RCP</i> (Part 3. B. <i>In-Situ</i> Burning of Spilled Oil).			Any activity that overlaps in time and space with ESA-listed species and may affect individual animals (e.g., noise, ship strike, smoke particulates, or other harm or harassment) should be authorized by an ESA Section 7 consultation.

3640.2.2 – Secondary Response Strategies

Secondary response strategies may require permits or authorizations from wildlife agencies. Responders must obtain or verify proper authorizations and permits (Table 3-4) prior to strategy implementation.

3640.2.2.1 – Wildlife Hazing/Deterrence

Responders who wish to conduct wildlife deterrence activities will need to complete a Startup or Comprehensive WRP ([Section 9740.3.7](#)). Requested activities may not be conducted until the appropriate authorizations and permits (Table 3-4; Figure 4-2) have been received. Any wildlife deterrence activities for species that are listed under the MMPA or as threatened or endangered under the ESA will be addressed via FOSC consultation with USFWS and NMFS.

Only individuals trained and certified within the past three years by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, in bird deterrence techniques will be authorized to conduct migratory bird deterrence activities. Additional individuals may be approved by ADF&G on a case-by-case basis based on a thorough review of training protocols, training records, individual and organization experience, and incident details. This information must be included in the Startup or Comprehensive WRP and approved by all wildlife agencies. Required oversight for migratory bird deterrence activities will be conducted by USFWS or ADF&G. Only individuals trained and certified in wildlife deterrents by an ADF&G-approved training within the past three years will be authorized to conduct terrestrial mammal hazing activities, including bear hazing. This information should be included in the Startup or Comprehensive WRP ([Section 9740.3.7](#)) and approved by all agencies.

For detailed protocols and equipment lists, authorized marine mammal responders will refer to the NMFS *Arctic Marine Mammal Disaster Response Guidelines*, or NMFS *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, both available on the [NOAA Institutional Repository](#).

It is essential for appropriately trained individuals to conduct hazing/deterrence activities not only for the safety of all responders, but also to minimize impacts to the animals being hazed/deterred and to prevent inadvertently disturbing non-target species. Wildlife can respond in unpredictable ways to disturbance; therefore, it is imperative that responders conducting hazing/deterrence activities are trained to understand animal behavior. Hazing and deterrence of other species will be developed on an incident-specific basis. [Section 9740.2](#) provides information on deterrence activities for individual wildlife species or species groups.

3640.2.2.1.1 – Authorizations and Permits for Wildlife Hazing/Deterrence

Permits or authorizations are required before hazing/deterrence activities may be conducted (Table 3-4; Figure 4-2). Agency authorizations for hazing/deterrence activities will depend on factors such as species and life stages; location; availability, training, and experience of responders; and the presence of non-target species. Responders may apply for authorization to haze/deter wildlife by completing a Startup or Comprehensive WRP ([Section 9740.2](#)) and submitting it to the wildlife agencies and OSCs for consideration and approval.

After receiving the Startup or Comprehensive WRP, wildlife agencies will determine whether to issue the requested permits based on proposed tactics, species, life stages, personnel training and experience, and other submitted information. Completing either WRP does not guarantee permit issuance.

Responders who already have valid permits to conduct wildlife hazing/deterrence activities will need to:

1. Follow the terms of their permit.

2. Immediately notify the appropriate wildlife agency representatives to advise them of actions planned or taken.
3. Submit a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) to the wildlife agencies and OSCs within 24 hours following the initiation of wildlife hazing/deterrence activities.

3640.2.2.2 – Pre-emptive Capture

Pre-emptive capture is the capture, handling, transportation, short-term holding, and release of healthy, uncontaminated wildlife.

All responders who wish to conduct pre-emptive capture of any wildlife species should fill out a Comprehensive WRP ([Section 3650.2](#); [Section 9740.3.7.2](#)) and submit it to the wildlife agencies and OSCs. Any pre-emptive capture-related activities for species that are listed as threatened or endangered under the ESA will be addressed via FOSC ESA consultation with USFWS and NMFS. [Section 9740.2](#) provides species-specific information on pre-emptive capture. Possible organizations and equipment needed for handling marine mammals under NMFS's jurisdiction can be found in the Appendices for the NMFS *Arctic Marine Mammal Disaster Response Guidelines* and NMFS *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines* available at the [NOAA Institutional Repository](#).

3640.2.2.2.1 – Authorizations and Permits for Pre-emptive Capture

Responders who wish to conduct pre-emptive capture of unoiled wildlife as part of a spill response need authorizations and permits from wildlife agencies and the OSCs prior to initiating activities (Table 3-4). Responders may apply for authorization to conduct pre-emptive capture of unoiled wildlife by completing a Comprehensive WRP ([Section 3650.2](#); [Section 9740.3.7.2](#)) and submitting it to the wildlife agencies and OSCs for consideration. A Startup WRP cannot be used to request pre-emptive capture activities.

After receiving the completed Comprehensive WRP, wildlife agencies will decide whether to issue the requested permits based on proposed tactics, species, life stages, personnel training and experience, and other submitted information. Completing the Comprehensive WRP does not guarantee permit issuance.

3640.2.2.3 – Authorizations and Permits for Secondary Response Strategies

Authorizations or permits are required before hazing/deterrence activities may be conducted ([Section 3640.2.2.1.1](#); Table 3-4; Figure 4-2). Responders who wish to conduct wildlife deterrence activities will need to complete a Startup or Comprehensive WRP ([Section 9740.3.7](#)).

Responders who wish to conduct pre-emptive capture of unoiled wildlife as part of a spill response need authorizations and permits from wildlife agencies and the OSCs prior to initiating activities ([Section 3640.2.2.2.1](#); Table 3-4). Responders may apply for authorization to conduct pre-emptive capture of unoiled wildlife by completing a Comprehensive WRP ([Section 3650.2](#); [Section 9740.3.7.2](#)) and submitting it to the wildlife agencies and OSCs for consideration. A Startup WRP cannot be used to request pre-emptive capture activities.

Table 3-4: Wildlife Authorizations and Permits for Secondary Response Strategies.

Strategy or Tactic	Permit or Authorization Needed ...	Agency and Species	Permit or Authorization	Additional Considerations
Any that may impact ESA-listed species	If a federal agency (e.g., USCG, EPA) funds, authorizes, or conducts a response that includes activities that are potential stressors AND overlap in time and space with ESA-listed species.	NMFS - whales, porpoises, seals, sea lions, and marine fish USFWS - birds, sea otters, and polar bears	Emergency ESA Section 7 Consultation A federal action agency consults with NMFS and USFWS to mitigate and authorize take of ESA-listed species that may be impacted by spill response activities.	Whenever possible, NMFS and USFWS will combine the initial consultations into one document for efficient incorporation into other response activities.
Any that may impact marine mammals	Always	NMFS - whales, porpoises, seals, and sea lions USFWS - sea otters, walrus, and polar bears	MMPA Authorization The MMPA allows federal, state, or local government officials or employees to humanely take marine mammals in the course of his or her duties as an official or employee if such taking is for: 1) the protection or welfare of the mammal, 2) the protection of the public health and welfare, or 3) the nonlethal removal of nuisance animals. Non-government personnel can be authorized to humanely take marine mammals under MMPA section 112(c) during an incident.	Non-government personnel can be authorized by NMFS MMHSRP personnel to harass species under NMFS's jurisdiction. That harassment must be approved on an incident-species basis and reported. A specific MMPA Letter of Authorization (LOA) for non-government personnel to take sea otters, walrus, and polar bears is required and can be obtained expeditiously from the USFWS via the USFWS Spill Response Coordinator during an incident, or as part of the pre-spill planning process.
Bird hazing ¹ – passive (visual only)	If eagles may be present	USFWS - eagles	USFWS - Eagle Depredation Permit	All bird hazing activities should be addressed in the Startup or Comprehensive WRP to prevent hazing/deterrence of non-target species.
Bird hazing ¹ – active	Always	ADF&G - birds	ADF&G - Wildlife Response Permit USFWS - Eagle Depredation Permit	All bird hazing activities should be addressed in the Startup or Comprehensive WRP to prevent hazing/deterrence of non-target species.
Terrestrial mammal hazing ¹	Always	ADF&G - all	ADF&G - Wildlife Response Permit	All hazing activities should be addressed in the Startup or Comprehensive WRP to prevent hazing of non-target species.

Strategy or Tactic	Permit or Authorization Needed ...	Agency and Species	Permit or Authorization	Additional Considerations
Marine mammal deterrence ¹	Always	NMFS - whales, porpoises, seals, and sea lions USFWS - sea otters, walrus, polar bears	NMFS – Case-by case authorization through MMHSRP permit. USFWS - MMPA section 112(c) LOA is required for take of sea otters, walrus, and polar bears, even in emergencies. This can be obtained expeditiously from the USFWS or as part of the oil spill response planning process.	MMHSRP = Request verbal case-by-case approval from the NMFS Regional Stranding Program Coordinator or associated co-investigator. All deterrence activities should be addressed in the Startup or Comprehensive WRP to prevent deterrence of non-target species.
Pre-emptive capture ²	Always	NMFS - whales, porpoises, seals, and sea lions USFWS - migratory birds, sea otters, walrus, polar bears ADF&G - terrestrial mammals, furbearers, non-migratory birds	NMFS - Case-by-case authorization through MMHSRP permit. USFWS - Migratory Bird permit; MMPA section 112(c) LOA is required for take of sea otters, walrus, and polar bears, even in emergencies. This can be obtained expeditiously from the USFWS or as part of the oil spill response planning process. ADF&G – Case-by-case authorization for transport or possession of wildlife.	MMHSRP = Request verbal case-by-case approval from the NMFS Regional Stranding Program Coordinator or associated co-investigator. Pre-emptive capture information should be addressed in the Comprehensive WRP.

¹ See also [Section 3640.2.2.1.1](#) – Authorizations and Permits for Wildlife Hazing/Deterrence

² See also [Section 3640.2.2.2.1](#) – Authorizations and Permits for Pre-emptive Capture

3640.2.3 – Tertiary Response Strategies

Tertiary response is the capture, handling, transport, rehabilitation, and release of oiled or injured wildlife.

All responders who wish to capture, transport, stabilize, or rehabilitate any wildlife species should fill out a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) and submit it to the wildlife agencies and OSCs. Tertiary response activities for species that are listed under the MMPA or as threatened or endangered under the ESA will be addressed via FOSC consultation with USFWS and NMFS.

Responders must ensure that all required permits or authorizations have been obtained prior to implementing any tertiary response strategies (Table 3-5; Figure 4-2).

3640.2.3.1 – Tertiary Response Guidelines

Capture, transport, stabilization, rehabilitation, and release of oiled animals should follow these guidelines:

- For marine mammals (except sea otters and polar bears), find equipment lists and facility criteria for handling, care, and rehabilitation in the:
 - *NMFS Arctic Marine Mammal Disaster Response Guidelines*, and the *NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines*, including the Appendices, at the [NOAA Institutional Repository](#).
- For polar bears, use the:
 - Miller, S. (ed.). 2015. *Oil Spill Response Plan for Polar Bears in Alaska*. U.S. Fish and Wildlife Service, Anchorage, Alaska. 65 pp. Available on the ADEC [Area Plan References and Tools](#) web page.
- For sea otters, use:
 - Williams, Terrie M., and Randall W. Davis (eds). 1995. *Emergency Care and Rehabilitation of Oiled Sea Otters: A guide for oil spills involving fur bearing animals*. Fairbanks: University of Alaska Press. 279 pp. Available on the ADEC [Area Plan References and Tools](#) web page.
- For birds, including equipment and materials required for capture and stabilization kits and facilities, use:
 - Berg, C. (ed). 2003. *Best Practices for Migratory Bird Care during Oil Spill Response*. U.S. Fish and Wildlife Service, Anchorage, Alaska, 82 pp. Available on the ADEC [Area Plan References and Tools](#) web page.
- Additional references, information, and recommendations will be provided by wildlife agencies. Wildlife agency contact information is available in [Initial Emergency Contacts](#).

3640.2.3.2 – Authorizations and Permits for Tertiary Response Activities

Permits or authorizations are required before capture, transport, stabilization, or rehabilitation activities may be conducted (Table 3-5; Figure 4-3). Agency authorizations for tertiary response activities will depend on factors such as species and life stages; location; availability, training, and experience of responders in capture and rehabilitation; sufficiency of cleaning and rehabilitation facilities; and release timelines and locations.

1 Responders may apply for authorization to capture, transport, stabilize, or rehabilitate wildlife by
2 completing a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) and submitting it to the
3 wildlife agencies and OSCs for consideration. After receiving either WRP, wildlife agencies will decide
4 whether to issue the requested permits based on the information submitted to them, such as the
5 species, life stages, personnel experience, and facility sufficiency. Completing the Startup or
6 Comprehensive WRP does not guarantee permit issuance.

7 Responders who already have valid permits to conduct oiled wildlife capture, transport, stabilization, or
8 rehabilitation activities will need to:

- 9 1. Follow the terms of their permit.
- 10 2. Immediately notify the appropriate wildlife agency representatives to advise them of actions
11 planned or taken.
- 12 3. Responders should submit a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) to
13 the wildlife agencies and OSCs within 24 hours following the initiation of oiled wildlife capture,
14 transport, stabilization, or rehabilitation activities.

Table 3-5: Wildlife Authorizations and Permits for Tertiary Response Strategies.

Strategy or Tactic	Permit or Authorization Needed ...	Agency and Species	Permit or Authorization	Additional Considerations
Any that may impact ESA-listed species	If a federal agency (e.g., USCG, EPA) funds, authorizes, or conducts a response that includes activities that are potential stressors AND overlap in time and space with ESA-listed species.	NMFS - whales, porpoises, seals, sea lions, and marine fish USFWS - birds, sea otters, and polar bears	Emergency ESA Section 7 Consultation A federal action agency consults with NMFS and USFWS to mitigate and authorize take of ESA-listed species that may be impacted by spill response activities.	Whenever possible, NMFS and USFWS will combine the initial consultations into one document for efficient incorporation into other response activities.
Any that involve marine mammals	Always	NMFS - whales, porpoises, seals, and sea lions USFWS - sea otters, walrus, and polar bears	NMFS - Case-by-case authorization through MMHSRP permit. USFWS - MMPA section 112(c) Letter of Authorization is required for take of sea otters, walrus, and polar bears, even in emergencies. This can be obtained expeditiously from the USFWS or as part of the oil spill response planning process.	All tertiary response activities should be addressed in the Startup or Comprehensive WRP to prevent impacts to non-target species.
Any that involve birds	Always	USFWS - migratory birds, eagles ADF&G - non-migratory birds	USFWS - Migratory Bird Permit, Eagle Depredation Permit ADF&G - Wildlife Response Permit	All tertiary response activities should be addressed in the Startup or Comprehensive WRP to prevent impacts to non-target species.
Any that involve terrestrial mammals, furbearers, non-migratory birds	Always	ADF&G - terrestrial mammals, furbearers, non-migratory birds	Case-by-case authorization or Wildlife Response Permit (varies by species)	All tertiary response activities should be addressed in the Startup or Comprehensive WRP to prevent impacts to non-target species.

3650 – Request for Wildlife Response Activities

During an emergency oil spill response when wildlife is or could become oiled, some or portions of the wildlife response strategies may need to be implemented before all the details necessary to carry out entire strategies are available. A two-phase process allows initial wildlife response strategy implementation as soon as possible using the Startup WRP ([Section 9740.3.7.1](#)) and allows additional details to be added to the Comprehensive WRP as the spill response continues. This two-phase process allows time to:

- Scale the IMT wildlife sections (EU, WB) to the size appropriate for the incident.
- Mobilize wildlife responders.
- Conduct immediate authorized response activities for impacted wildlife.⁸
- Develop details necessary to complete the Comprehensive WRP.

The Startup and Comprehensive WRP forms are in [Section 9740.3.7](#). Both forms include requests to conduct primary, secondary, and tertiary response strategies, except for pre-emptive capture which is not included in the Startup WRP. The Startup WRP is an abbreviated version of the Comprehensive WRP (Table 3-6).

Table 3-6: Comparison of Startup and Comprehensive Wildlife Response Plans (WRPs) for Oil Spill Response in Alaska.

Startup WRP	Comprehensive WRP
Allows request and implementation of some strategies within the first 72 hours of an incident.	Allows longer-term response strategies to be developed and communicated to incident command throughout the incident.
Need not be used if there are ample resources to complete the Comprehensive WRP before any proposed response strategies are initiated.	Must always be used either in lieu of, or (after 72 hours) in conjunction with, the Startup WRP when wildlife response strategies are requested or implemented.
Can be completed citing existing references (e.g., operations manual for a stabilization or rehabilitation facility).	Can cite existing references but should also include spill-specific information (e.g., specific personnel, staging areas, wildlife transportation).

3650.1 – Startup Wildlife Response Plan (WRP)

The Startup WRP is a request to begin the process of authorizing all or some portion of wildlife response strategies to be conducted for up to 72 hours after the start of a spill. Wildlife response activities approved in the Startup WRP (including carcass collection, hazing/deterrence, or capture and rehabilitation) will not be authorized beyond 72 hours after the start of the spill unless a Comprehensive WRP has been submitted to and approved by the wildlife agencies. Pre-emptive capture is uncommon in

⁸ Responders may already possess a valid permit to conduct certain wildlife response activities, such as bird or terrestrial mammal hazing. If so, the permitted activities may be conducted if:

1. All conditions and terms of the permit are followed.
2. The appropriate wildlife agency representative is notified according to the terms of the permit and informed of actions taken and planned.
3. A Startup or Comprehensive WRP is submitted to the wildlife agencies within 24 hours of initiating the permitted activities.
4. The permitted activity does not also require incident-specific authorization (e.g., carcass collection).

the early stages of a response and, therefore, is not included in the Startup WRP. Following approval by the wildlife agencies, the Startup WRP should be submitted to the OSCs for their approval and for inclusion in the next Incident Action Plan (IAP).

Agency approval of the Startup WRP does not negate the need for permits and other authorizations, which are required before wildlife response activities can begin (see Table 4-1). In some situations, agencies may provide emergency authorization (verbal or email approval) or an organization may already have a pre-issued permit or letter of authorization (LOA). When reviewing the Startup WRP, the wildlife agencies will indicate the status of required authorizations and permits in Section V of the form.

The Startup WRP will typically be filled out by the RP/PRP. However, if a response is led by the federal or state government, the OSCs may request portions of this form to be filled out by the wildlife agencies until an appropriate contractor or WBD is mobilized. ESA section 7 consultations occur between federal action agencies and the USFWS and NMFS and are not the RP/PRP's responsibility to complete. However, because take of ESA-listed species is not authorized until a section 7 consultation has been initiated, "ESA section 7" is included on the Startup WRP to inform the IMT of the overall status of wildlife response activities. Table 3-7 shows the organization or person responsible for each section of the Startup WRP ([Section 9740.3.7.1](#)).

Table 3-7: Organization or Person Responsible for Completing Sections of the Startup Wildlife Response Plan (WRP) for Oil Spill Response in Alaska.

Section	Organization or Person Responsible for Completion
I. Incident Summary	RP/PRP
II. State and Federal On-Scene Coordinator Response to Request	OSCs
III. Wildlife Agency Response to Request	Wildlife Agencies
IV. Request for Startup of Wildlife Response Strategies	RP/PRP
V. Wildlife Agency Permits and Authorizations for Proposed Response	Wildlife Agencies
VI. Additional Conditions	Wildlife Agencies
VII. Worksheet for Operations Section and Field Personnel	RP/PRP

3650.2 – Comprehensive Wildlife Response Plan (WRP)

The Comprehensive WRP should be completed and approved by the wildlife agencies and the Unified Command before any carcass collection, hazing/deterrence, pre-emptive capture, or capture and rehabilitation activities begin or before the Startup WRP expires.

Wildlife response activities approved in the Startup WRP will not be authorized beyond 72 hours after the start of the spill unless a Comprehensive WRP has been submitted, reviewed, and approved by the wildlife agencies (and NRDAR Trustees, if applicable). This includes carcass collection, hazing/deterrence, or capture and rehabilitation. A Comprehensive WRP must always be submitted to request pre-emptive capture. A Comprehensive WRP may be submitted and approved by the wildlife agencies and OSCs for certain activities (e.g., carcass collection and hazing of birds) and amended later if additional response actions are warranted (e.g., deterrence of marine mammals or capture and rehabilitation of birds). Following approval by the wildlife agencies, the Comprehensive WRP should then be submitted to the Federal and State OSCs for their approval and inclusion in the next IAP.

The Comprehensive WRP includes expanded or additional sections compared to the Startup WRP (see Table 3-6):

- Section IV includes tables to provide detailed species information based on actual field observations or input from the best data sources available ([Arctic Environmental Response Management Application \(ERMA\)](#)) online mapping tool, Environmental Sensitivity Index maps, input from wildlife agencies, etc.).
- Section V requests information on primary response strategies undertaken or planned.
- Section VIII includes information to request pre-emptive capture of oiled wildlife.
- Sections VI – IX request detailed information necessary to successfully implement the proposed primary, secondary, and tertiary response strategies.

Authorizations and permits are still required before wildlife response activities can begin (Table 4-1), even with an agency-approved Comprehensive WRP. In some situations, agencies may provide emergency authorization (verbal or email approval) or an organization may already have a pre-issued permit or LOA. The status of required authorizations and permits will be documented by wildlife agency representatives in Section X of the Comprehensive WRP.

Comprehensive WRPs are typically filled out by the RP/PRP. However, if a response is led by the federal or state government, the Federal or State OSC may request portions of this form be filled out by the wildlife agencies until an appropriate contractor or WBD is mobilized. ESA section 7 consultations occur between federal action agencies and the USFWS and NMFS and are not the RP/PRP's responsibility to complete. However, because take of ESA-listed species is not authorized until the ESA section 7 consultation has been initiated, "ESA section 7 consultation" is included on the Comprehensive WRP to help inform the IMT of the overall status of wildlife response activities. Table 3-8 shows the organization or person responsible for completing each section of the Comprehensive WRP ([Section 9740.3.7.2](#)).

Table 3-8: Organization or Persons Responsible for Completing Sections of the Comprehensive Wildlife Response Plan (WRP) for Oil Spill Response in Alaska.

Section	Organization or Person Responsible for Completion
I. Incident Summary	RP/PRP
II. State and Federal On-Scene Coordinator Response to Request	OSCs
III. Wildlife Agency Response to Request	Wildlife Agencies
IV. Wildlife Information and Proposed Response Strategies: Part A – Non-ESA-listed Species Groups Part B – ESA-listed Species	RP/PRP
V. Other Primary Response Actions	RP/PRP
VI. Carcass Collection Plan	RP/PRP (with wildlife agency/NRDAR Trustee input)
VII. Hazing/Deterrence Plan	RP/PRP (with wildlife agency input)
VIII. Pre-emptive Capture Plan	RP/PRP (with wildlife agency input)
IX. Capture, Transport, Stabilization, Rehabilitation, and Release Plan	RP/PRP (with wildlife agency input)
X. Wildlife Agency Permits and Authorizations for Proposed Response	Wildlife Agencies
XI. Additional Conditions	Wildlife Agencies
XII. Worksheet for Operations Section and Field Personnel	RP/PRP

3650.3 – Inadvertent Impacts of Wildlife Response Activities

Response activities, even those designed to assist wildlife, may result in inadvertent impacts to other species which should be anticipated and planned for. For example, authorized hazing or deterrence of

1 waterfowl conducted near a Steller sea lion rookery could cause the Steller sea lions to flush into the
2 water, become oiled, or crush pups. Responders must have a full understanding of authorized AND
3 unauthorized activities (and any conditions attached to authorizations) to minimize secondary or
4 inadvertent impacts. Restrictions or other conditions may come from stipulations in permits or LOAs,
5 protection measures from ESA section 7 consultations, and information provided in the Startup or
6 Comprehensive WRP. The EU Lead should be proactive about compiling this information and providing it
7 to the WB and other field responders. In turn, field responders should relay important information and
8 observations to both the IMT and wildlife agency representatives regarding the presence of wildlife and
9 secondary or inadvertent impacts to wildlife from response activities.

4000 – PLANNING

4600 – ENVIRONMENTAL UNIT (EU)

4610 – *Planning Activities for Fish and Wildlife Protection*

4610.1 – Resources at Risk Summary

The Resources at Risk Summary (form ICS 232-CG; available on the USCG [CG-612 Directives and Publications Division](#) web page) provides information about sites in the incident area that are sensitive due to environmental, archaeo-cultural, or socio-economic resources, and it identifies incident-specific priorities and issues. The Resources at Risk Summary is prepared by the EU Leader with input from natural and cultural resource agencies. This form should be reviewed and updated prior to the Planning Meeting for each Operational Period.

This process is scalable. For smaller incidents, a virtual EU may be established with natural and cultural resource management agencies working collectively to prepare this summary. Resource and land management agencies may include the NMFS, NOAA, USFWS, U.S. Forest Service, National Park Service, Bureau of Land Management, Department of Defense, Alaska Office of History and Archaeology (cultural resources), or others. The U.S. Geological Survey may be able to provide pertinent information on wildlife and their habitats. The Bureau of Ocean Energy Management may also be able to provide expertise on marine resources and oil spill modeling expertise for Outer Continental Shelf incidents.

4610.2 – Environmentally Sensitive Areas, Areas of Public Concern, and Potential Wildlife Impacts

Natural resource agencies are an excellent source for information on environmentally sensitive areas as well as areas of public concern in Alaska. Additional information is organized by geographic zone and available in the *Alaska Sensitive Areas Compendium*. This document is referenced by all four ACPs and hosted on the ADEC [Area Plan References and Tools](#) web page.

Information on potential impacts to fish and wildlife resources is available from wildlife agencies in conjunction with the WPG. Wildlife agency contact information is available on the [Initial Emergency Contacts](#) page.

4610.3 – General Wildlife Protection Considerations

Wildlife agency representatives can provide recommendations to the Federal and State OSCs on how response activities can be performed in a manner that minimizes adverse impacts on wildlife.

Recommendations include actions to prevent:

- The introduction of rats to rat-free islands.
- Unnecessary or illegal disturbance to sensitive species and habitats, such as nesting raptors, seabird rookeries, and marine mammal haulouts and pupping areas.
- Potential injury or disturbance of bears by spill-related response personnel.
- Illegal collection of wildlife parts by response personnel.
- Wildlife exposure to cleaning agents and bioremediation substances used for shoreline rehabilitation.

4610.3.1 – Preventing Rat Introduction to Rat-Free Islands

Many of Alaska’s remote islands have no rats. Invasive rats are a significant concern for islands in the Alaska Maritime NWR and the Pribilof Islands because of the devastation introduced rats can have on island ecosystems, including direct predation of nesting seabirds and endemic songbirds, and the introduction of disease to hauled-out marine mammals and terrestrial mammals. Once rats are established on an island or at a remote location, they are extremely difficult and expensive to eradicate.

Grounded vessels, or vessels sinking close to shore, allow rats to access the shore. Rats can also drift to shore on vessel debris. In addition, response vessels or aircraft could inadvertently transport rats to rat-free areas. Response personnel can use the *Checklist: Vessel Grounding or Sinking Response* in [Section 9740.3.4](#) as an aid to protect wildlife during vessel groundings and sinkings.

All vessels operating in Alaska should follow the *Rat Prevention Guidelines for Vessels* ([Section 9740.3.5](#)). Stricken vessels should be examined for rats, if possible and safe to do so. Vessels associated with spill response activities should also be examined for rats. The USFWS and ADF&G can provide additional guidance and assistance in finding resources to examine boats and planes for rats.

If it is not possible to conduct onboard rat inspection and prevention activities for a stricken or response vessel, USFWS and ADF&G representatives will develop an incident-specific rat prevention plan for approval by the OSCs. The plan will include, but not be limited to, the deployment of rat trap and poison stations in appropriate locations on the vessel and the island, names of individuals authorized to deploy and monitor the stations, and a station monitoring plan.

See [Section 3630.1](#) for additional information on keeping rats off of rat-free islands.

4610.3.2 – Preventing Unnecessary or Illegal Disturbance to Sensitive Species and Habitats

Field activities associated with oil spills (particularly those using on-site work crews, helicopters, low-flying aircraft, and vessels) can cause unnecessary and potentially illegal disturbance to sensitive species and habitats. This disturbance can cause wildlife to expend energy to move away from the disturbance, can drive wildlife into oiled areas, and can affect the survival of young wildlife.

The BGEPA specifically prohibits the disturbance of eagles. Any action that causes harassment or death of migratory birds is prohibited under the MBTA. The MMPA prohibits the take⁹ of sea otters, polar bears, seals, sea lions, walruses, whales, dolphins, and porpoises. Section 109(h) of the MMPA allows take by a federal or state governmental official during their official duties, provided the take is for the welfare and protection of the animal. Therefore, the FOSC will need to consult with USFWS and NMFS representatives to determine the potential impacts of response actions on eagles, other migratory birds, and marine mammals. The USFWS and NMFS will assist the FOSC in identifying potential impacts, mitigating or avoiding those impacts, and determining if take has occurred as the result of response activities.

The ESA provides protective measures for species listed as threatened or endangered and their designated critical habitats. The ESA prohibits unauthorized take¹⁰ of ESA-listed species. Section 7 of the ESA requires any federal agency that authorizes, funds, or carries out activities that may affect listed species or designated critical habitat to consult with DOI (through USFWS) and DOC (through NMFS). The ESA and its implementing regulations provide special provisions for consultation during emergencies

⁹ Take, as defined under the MMPA, means “to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal.”

¹⁰Take, as defined under the ESA, means “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

1 such as an oil spill. In addition, the “Inter-agency Memorandum of Agreement Regarding Oil Spill
2 Planning and Response Activities Under the Federal Water Pollution Control Act’s National Oil and
3 Hazardous Substances Pollution Contingency Plan and the Endangered Species Act,”¹¹ signed in 2001,
4 provides special provisions for “emergency consultation” during an oil spill that may (or has) affected
5 listed species or their designated critical habitat. The USFWS and NMFS can make recommendations to
6 the FOSC to avoid the taking of listed species and reduce response-related impacts. If take of ESA-listed
7 species does occur because of response activities, formal section 7 consultation between the FOSC and
8 USFWS and NMFS will need to be conducted immediately after the incident. See [Section 4810](#) for
9 additional information about emergency ESA section 7 consultation.

10 To prevent unnecessary disturbance to wildlife, USFWS, NMFS, or ADF&G representatives may provide
11 notices, through the Federal Aviation Administration and the FOSC, to aircraft and mariners operating in
12 areas affected by a spill to remain a certain distance from wildlife concentration areas and designated
13 critical habitats. Such areas include, but are not limited to, marine mammal haulouts and pupping areas,
14 migratory bird concentration areas, seabird rookeries, and raptor nests. The Federal and State OSCs
15 must provide copies of the notices to all response personnel. In addition, this information should be in
16 news releases prepared by the OSCs or the Unified Command’s JIC.

17 During a spill response, wildlife agency representatives may recommend to the Federal and State OSCs
18 that response activities not occur during critical biological periods (e.g., nesting, breeding, pupping) in or
19 near sensitive areas. If response activities during these periods cannot be avoided, wildlife agency
20 representatives can authorize take and will recommend on-site agency personnel or contractors
21 monitor response activities to minimize disturbance and record take. See [Section 3610](#) for more
22 information on BMPs to minimize impacts to wildlife during a response.

23 *4610.3.3 – Preventing Injury and Disturbance to Bears*

24 On-shore responders may have interactions with brown, black, and polar bears; polar bears may also be
25 present offshore, in frozen or broken ice conditions, or in open water. To minimize the potential for
26 injuries to both response personnel and bears, wildlife agency representatives will coordinate with
27 Unified Command to determine if bear guards (i.e., individuals with expertise in avoiding bear-human
28 conflicts) should accompany work crews. Bear guards will need to have specialized training in bear
29 behavior, moving crews from an area (to eliminate having to shoot a bear), and shooting a bear if it
30 poses a threat to human life. Activities affecting polar bears will also be addressed via FOSC ESA section
31 7 consultation with USFWS and USFWS-provided authorizations under the MMPA. If bear hazing is
32 proposed, a Startup or Comprehensive WRP should be submitted to wildlife agencies. Authorizations
33 and permits are required by ADF&G (for brown or black bears) or USFWS (for polar bears) prior to
34 implementing bear hazing activities. See [Section 3640.2.2.1](#) for more information on wildlife hazing.

35 *4610.3.4 – Preventing the Collection of Wildlife Parts for Personal Use*

36 Policies for response personnel must include prohibitions on the collection of whole or partial remains
37 (parts) of wildlife for personal use. Wildlife parts include, but are not limited to, bones, feathers, teeth,
38 ivory, and pelts. Wildlife agencies will provide information on prohibitions on the collection of whole or
39 partial wildlife remains for personal use to the Federal and State OSCs. The Federal and State OSCs can
40 then incorporate this information into response policies and provide it to all response parties.

¹¹ Available on the ADEC [Area Plan References and Tools](#) web page.

4610.3.5 – Preventing Wildlife Exposure to Shoreline Treatment Chemicals

Wildlife can be exposed to cleaning agents and bioremediation substances used for shoreline treatment. Wildlife agency representatives will evaluate potential wildlife exposure and subsequent irritation, injury, or death. Wildlife agency representatives will provide recommendations to the Federal and State OSCs on appropriate avoidance and deterrent measures that should be included in shoreline treatment plans and procedures. In addition to OSC approval, the use of these agents must have the concurrence of the ARRT representatives from the EPA and State of Alaska. This concurrence should be obtained in consultation with DOC and DOI agencies when practical.

4610.4 – Wildlife Standards of Response

4610.4.1 – Standards of Response for Migratory Birds¹²

At a minimum, migratory bird responders must:

- Hold all necessary permits for bird-related response activities.
- Have experience in the capture, treatment, and care of oiled birds.
- Have experience conducting bird-related response activities within the Incident Command System (ICS) structure.
- Have sufficiently trained, equipped, and experienced staff, as well as the ability to train and equip personnel and volunteers for bird-related response during an emergency response.
- Be able to quickly mobilize to perform bird capture, field evaluation, and stabilization and transport, including to remote locations.
- Have access to appropriate facilities adequate for treating and housing oiled birds:
 - Be able to establish and operate bird intake, holding, and isolation areas within 12 to 24 hours of wildlife response activation.
 - Be able to establish and operate bird cleaning and pre-release areas within 48 hours of wildlife response activation.
- Hold an agreement with a licensed veterinarian, experienced in the treatment of oiled birds, to provide any necessary veterinary medical care.
- Use best practices as outlined in *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the ADEC [Area Plan References and Tools](#) web page.

4610.4.2 – Standards of Response for Marine Mammals under NMFS’s jurisdiction in Alaska

The NMFS Alaska Region Protected Resources Division developed standards for responders to assist with emergency response for marine mammals under NMFS’s jurisdiction in Alaska. They can be found in the NMFS *Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#) web page.

4610.4.3 – Standards of Response for Sea Otters in Alaska

At a minimum, sea otter responders must:

- Hold all necessary permits for sea otter-related response activities.

¹²Adapted from *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the ADEC [Area Plan References and Tools](#) web page.

- Have sufficient numbers of extensively trained, proficient, and experienced sea otter response personnel, so as to not cause undue injury or death to oiled or unoled sea otters.
 - Lists of trained and proficient personnel should be provided to USFWS as part of spill planning.
- Have experience conducting sea otter-related response activities within the ICS structure.
- Be sufficiently equipped for oiled sea otter response.
- Be able to quickly mobilize (within several days) personnel and equipment, including to remote locations, to perform sea otter capture, field evaluation, stabilization, and transport.
- Have access to facilities adequate for treating and housing oiled and unoled sea otters. Treatment facilities must include at a minimum:
 - Areas for triage/sedation;
 - Areas for cleaning/rinsing/drying;
 - Areas for recovery/holding (in quarantine) with access to heat, shade, and water;
 - A veterinary laboratory and equipment storage area; and
 - Staffing accommodations, including restrooms, sleeping, and dining areas.
- The treatment facility must be in an area where large quantities of water are available, with consideration given to disposal of cleanup waste.
- All medical care of sea otters must be under the direction of a licensed veterinarian experienced or trained in sea otter medicine.
- Medical care of oiled sea otters must be under the direction of a licensed veterinarian experienced in treating oiled sea otters.
- Use best practices as outlined in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.

4610.4.4 – Standards of Response for Polar Bears in Alaska

At a minimum, polar bear responders must:

- Hold all necessary permits for polar bear-related response activities.
- Have sufficient numbers of extensively trained, proficient, and experienced polar bear response personnel, so as to not cause undue injury or death to oiled or unoled polar bears.
 - Lists of trained and proficient personnel should be provided to USFWS as part of spill planning.
- Have experience conducting polar bear-related response activities within the ICS structure.
- Be sufficiently equipped for oiled polar bear response.
- Be able to quickly mobilize (within two days; within 8 hours for bear hazing/deterrence) personnel and equipment, including to remote locations, to perform polar bear hazing/deterrence, capture, field evaluation, stabilization, and transport.
- Have access to appropriate facilities adequate for treating and housing oiled and unoled polar bears. Treatment facilities must include at a minimum:
 1. Portable bear cages of a minimum size that equals twice the length of the animal (and the mechanics/trailers to move them);
 2. Areas for triage/sedation;

3. Areas for cleaning/rinsing/drying;
 4. Areas for recovery/holding (in quarantine) with access to heat, shade, and water;
 5. A veterinary laboratory and equipment storage area; and
 6. Staffing accommodations, including restrooms, sleeping, and dining areas.
- The treatment facility must be in an area where large quantities of water are available, with consideration given to disposal of cleanup waste.
 - All medical care of polar bears must be under the direction of a licensed veterinarian experienced or trained in polar bear medicine.
 - Use best practices, protocols, and procedures in *USFWS Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page.

4610.5 – Wildlife Protection Strategies

In an actual or potential oil spill, Federal and State OSCs will receive input from wildlife agency representatives to protect wildlife resources at risk, including sensitive species and their habitats and wildlife concentration areas. Because wildlife distribution can change with weather and seasons, this input can require on-scene observations by appropriate trained personnel, such as wildlife agency representatives or other contracted wildlife professionals. If *in situ* burning or dispersant use is considered, wildlife agency representatives will provide input to the Federal and State OSCs via the process outlined in Appendices III and VI of the *Alaska RCP*.

While wildlife protection strategies are discussed in-depth in [Section 3000](#) (*Operations*), it is important that both Operations and Planning/EU staff are familiar with these strategies. [Section 9740.2](#) provides information on primary, secondary, and tertiary response strategies for wildlife species (or species group) not addressed elsewhere in the WPG.

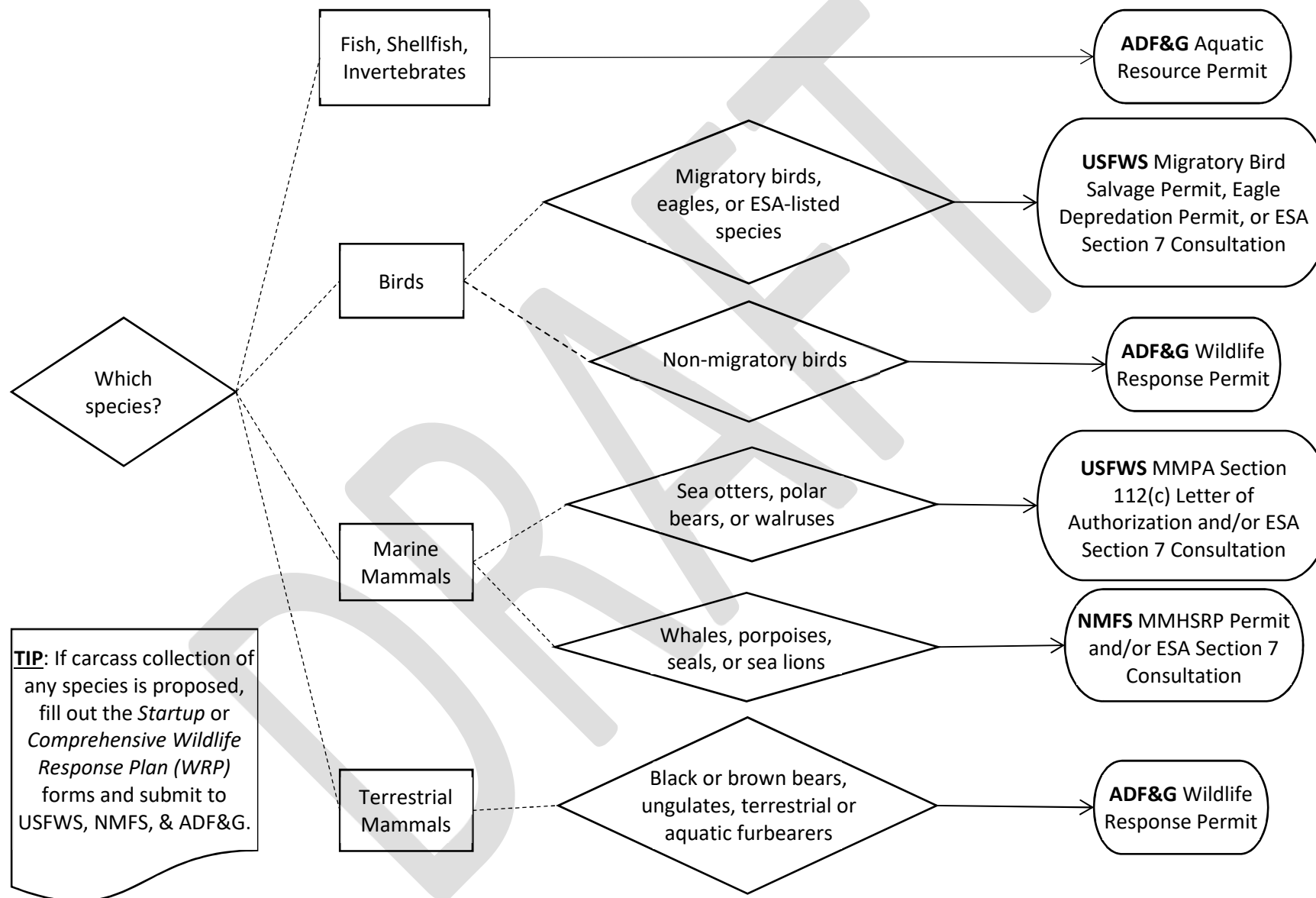
4610.5.1 – Primary Response Strategies

Primary response strategies emphasize controlling the release and spread of spilled oil at the source to prevent or reduce contamination of potentially affected species and their habitats. Primary response includes strategies such as mechanical cleanup, on-water recovery, protective booming, *in situ* burning, and dispersant use. The removal of oiled debris and oiled wildlife carcasses, both in water and on land, are also primary response strategies. See [Section 3640.2.1](#) (*Primary Response Strategies*) for detailed information. See Figure 4-1 and Table 3-3 for authorizations and permit requirements, including for removal of oiled carcasses; for FOSC consultation with USFWS and NMFS for species listed under the ESA or MMPA; and for compliance with other wildlife statutes (see [Section 1600](#), [Section 1700](#), and [Section 4800](#)).

Both oiled and unoled carcasses in the vicinity of a spill will need to be removed from the environment as soon as possible to minimize, or prevent, secondary contamination of scavengers, including raptors, polar bears, and terrestrial mammals. The collection of oiled wildlife carcasses will need to be performed as described in [Section 3630.2.1.1](#), to document impacts to wildlife from a spill, and for law enforcement and NRDAR purposes. Wildlife agency representatives overseeing wildlife response activities will develop, when appropriate, incident-specific protocols for carcass collection in conjunction with appropriate wildlife agency investigative or law enforcement personnel, federal and state NRDAR Trustees, and wildlife agency scientists.

To request approval for the collection of carcasses, responders should fill out a Startup or Comprehensive WRP ([Section 3650](#); [Section 9740.3.7](#)) and submit it to the wildlife agencies.

Figure 4-1: Carcass Collection Permits Flow Chart. See also Table 3-3 for specific authorization and permit information.



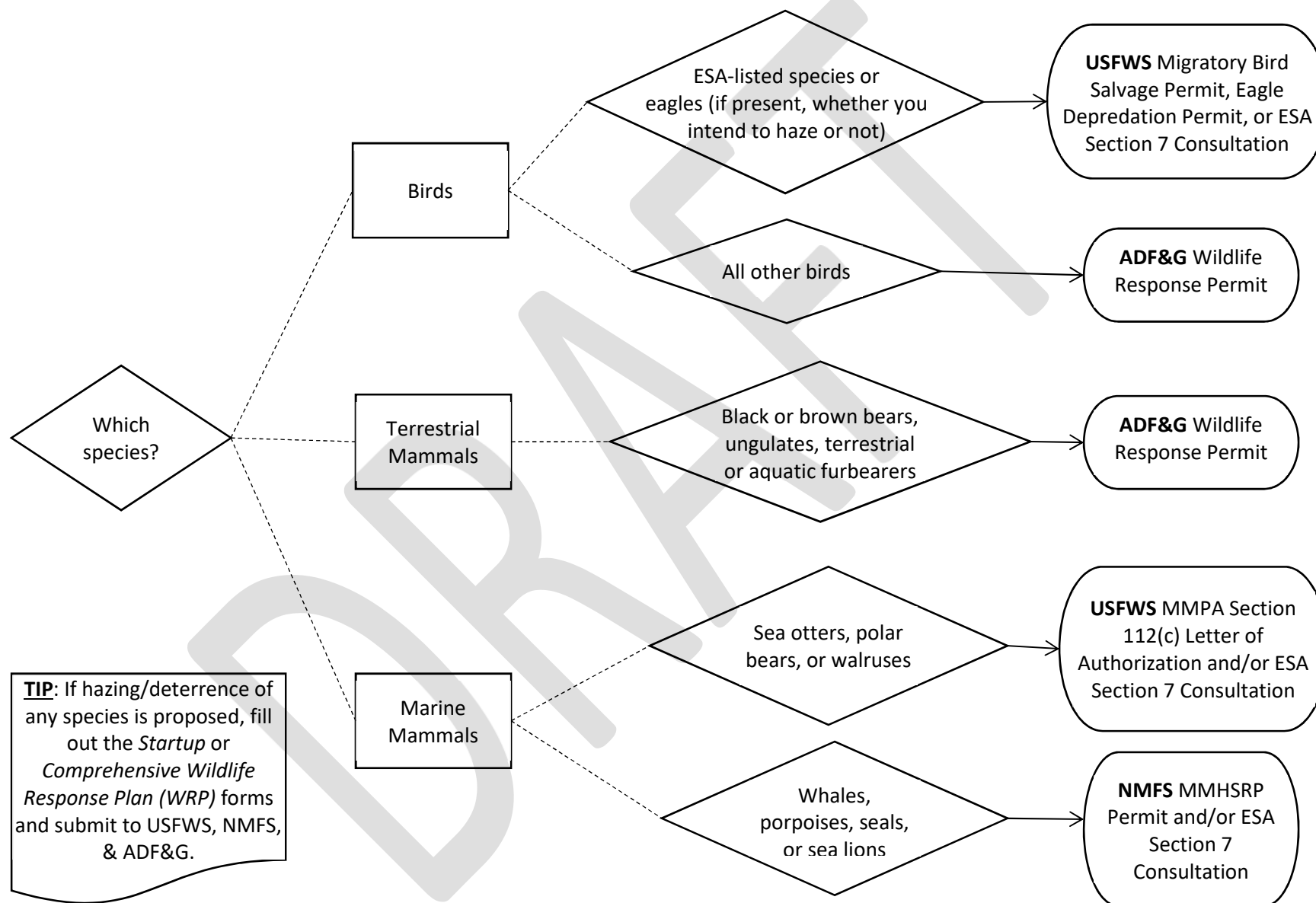
1 4610.5.2 – Secondary Response Strategies

2 Secondary response strategies for protecting wildlife emphasize keeping wildlife away from oiled areas.
3 These strategies include passive hazing and deterrence techniques such as visual methods (e.g., floating
4 or stationary human effigies, streamers, or helium-filled balloons) or physical barriers (e.g., fencing and
5 netting) and active techniques, such as auditory deterrence (e.g., propane cannons and audio-visual
6 alarms). Secondary response strategies also include the pre-emptive capture, handling, transportation,
7 short-term holding, and release of unoiled wildlife.

8 Only authorized and trained personnel may conduct these activities. See [Section 3640.2.2](#) (Secondary
9 Response Strategies) for detailed information. See Figure 4-2 and Table 3-4 for authorizations and
10 permit requirements; including for FOSC consultation with USFWS and NMFS for species listed under the
11 ESA or MMPA; and for compliance with other wildlife statutes (see [Section 1600](#), [Section 1700](#), and
12 [Section 4800](#)).

13 To request approval for wildlife hazing/deterrence, fill out a Startup or Comprehensive WRP ([Section](#)
14 [3650](#); [Section 9740.3.7](#)) and submit to the wildlife agencies. To request approval for pre-emptive
15 capture, fill out and submit a Comprehensive WRP ([Section 3650.2](#); [Section 9740.3.7.2](#)) to the wildlife
16 agencies.

Figure 4-2: Wildlife Hazing/Deterrence Permits Flow Chart. See also Table 3-4 for specific authorization and permit information.

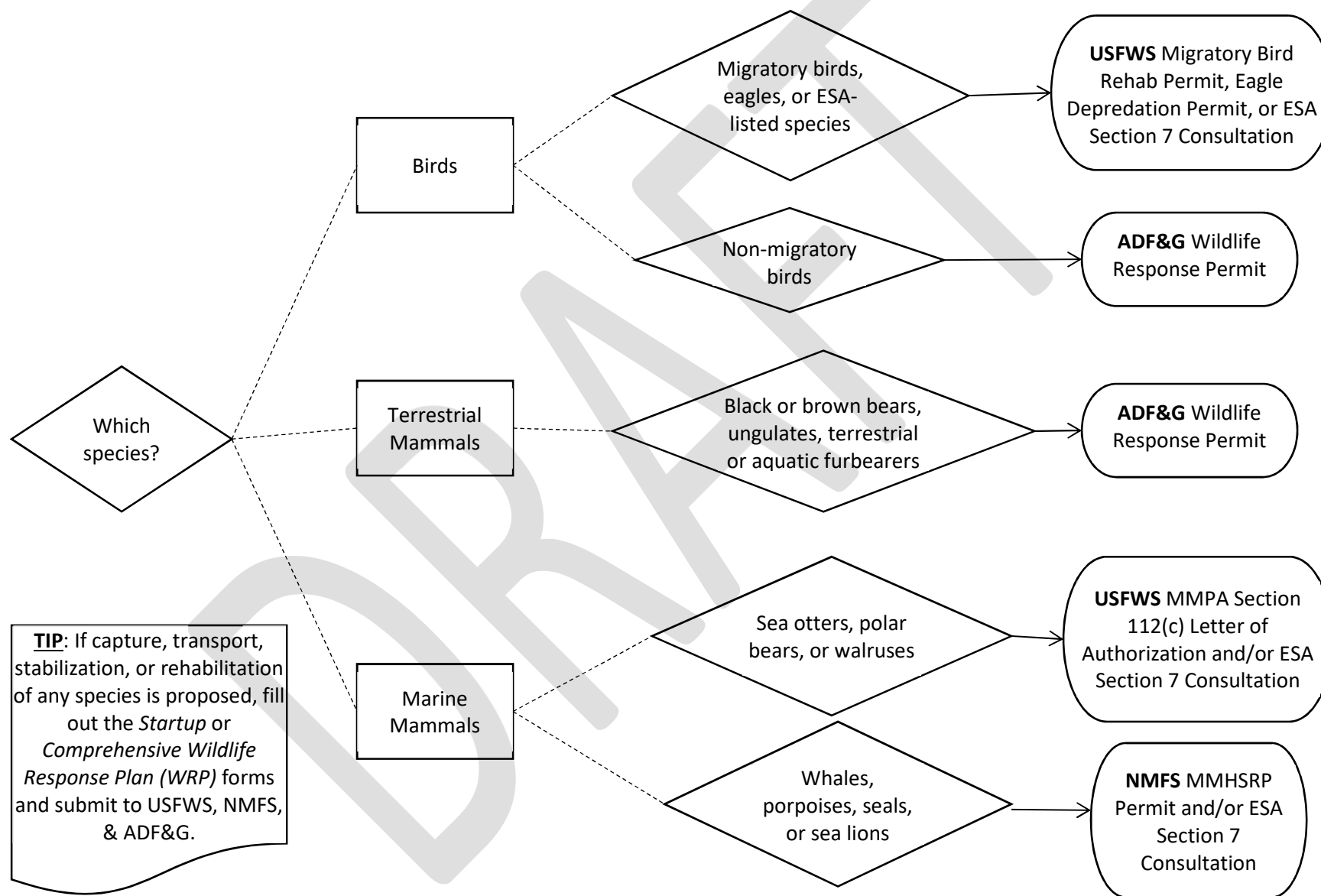


1 4610.5.3 – *Tertiary Response Strategies*

2 Tertiary response strategies for protecting wildlife include capturing, handling, transporting,
3 rehabilitating, holding, and releasing oiled or injured wildlife. They are detailed in [Section 3640.2.3](#)
4 (*Tertiary Response Strategies*). See Table 3-5 and Figure 4-3 for more information about required
5 authorizations and permits.

6 To request approval for any tertiary response activities, fill out a Startup or Comprehensive WRP
7 ([Section 3650](#); [Section 9740.3.7](#)) and submit to the wildlife agencies.

Figure 4-3: Wildlife Capture, Transport, Stabilization, or Rehabilitation Permits Flow Chart. See also Table 3-5 for specific authorization and permit information.



4800 – REQUIRED CORRESPONDENCE, PERMITS & CONSULTATION

4810 – Endangered Species Act (ESA) Consultations

The ESA provides a means to protect threatened and endangered species and the ecosystems upon which they depend. Section 7(a)(2) of the ESA requires each federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize ESA-listed species or adversely modify their designated critical habitats. Regulations for conducting section 7 consultation are set forth in 50 CFR Part 402. Where emergency¹³ actions in response to an actual or potential spill (such as overflights or spill response tactics) may affect ESA-listed species or their designated critical habitats, the federal agency conducting, authorizing, or funding the response (i.e., action agency; typically the USCG or EPA for spill response) will need to consult with the USFWS and NMFS regarding potential impacts to species under their respective jurisdictions.

ESA regulations recognize that an emergency may require expedited consultation (50 CFR §402.05). Emergency consultation procedures allow action agencies to avoid violating ESA prohibitions and incorporate ESA-listed species concerns during their response to an emergency. Figure 4-4 summarizes the section 7 consultation process.

The initial stages of emergency consultations usually are done by email or telephone, followed as soon as possible (within 48 hours) by written correspondence (typically e-mail) from the USFWS and NMFS, using the forms developed for Alaska ([Section 9740.3.6](#)). The written record establishes a timeline and provides the action agency with formal documentation of commitments made during the initial contact. As soon as possible, the USFWS and NMFS will offer recommendations to minimize the effects of the emergency response actions on listed species or their designated critical habitats. If this initial review indicates the action may result in jeopardy to the species or adverse modification to designated critical habitat, with no apparent means of reducing or avoiding the effects, the action agency must be notified and USFWS's and NMFS's conclusions documented. The NOAA scientific support coordinator (SSC) may serve as a liaison between the action agency and USFWS and NMFS.

In Alaska, the USFWS and NMFS will work directly with the action agency and the SSC to provide ESA protection measures (which may include Mitigation Measures, Reasonable and Prudent Measures, Terms and Conditions, and Conservation Recommendations, as defined under the ESA) and integrate them into the IAP. Integration into the IAP informs all responders about their responsibilities. ESA protection measures shall be added or modified as the response effort changes (e.g., for new or modified tactics) to reduce impacts to ESA-listed species. All interactions with listed species during a response must be documented and reported.

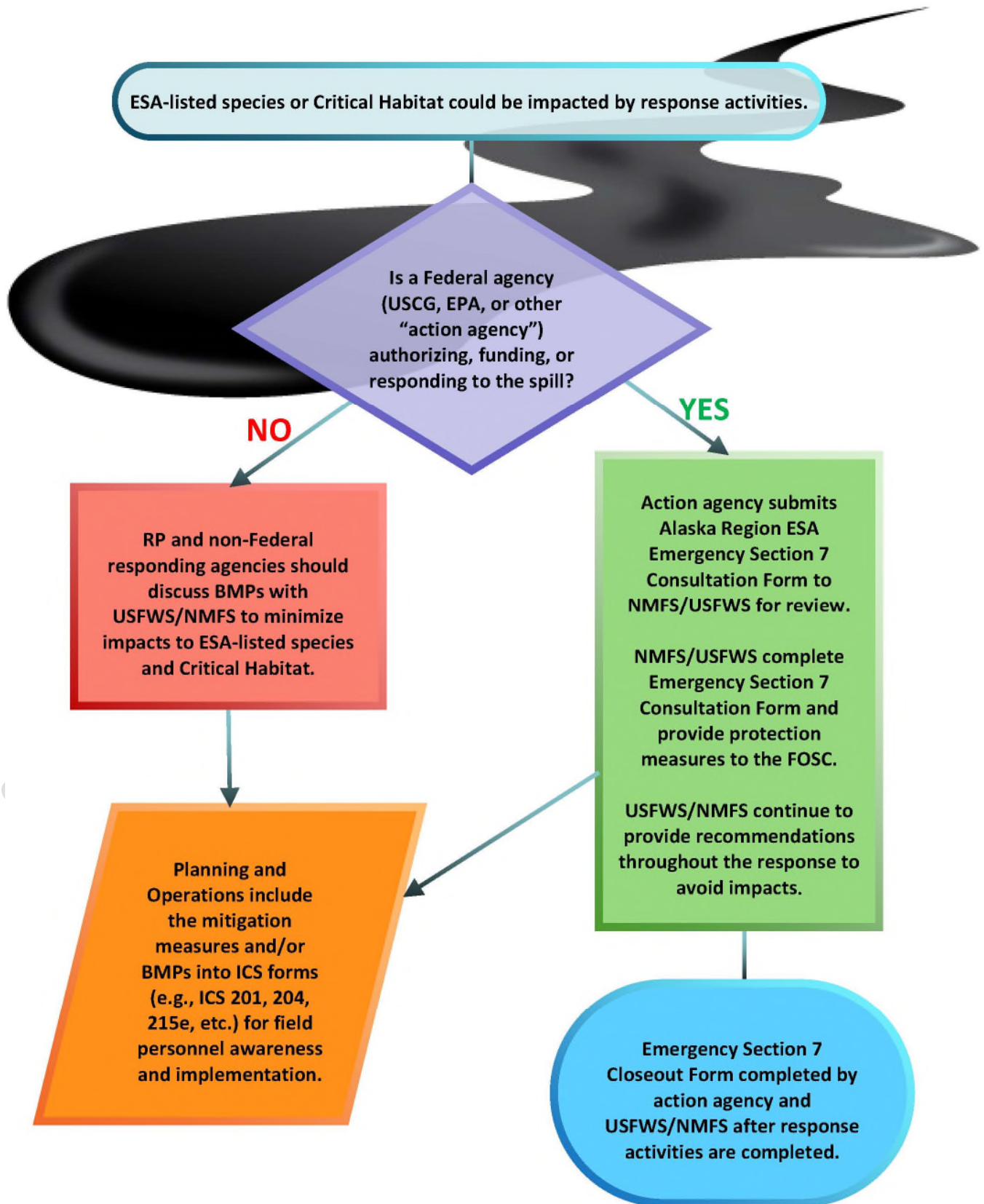
After an emergency response is complete, the action agency is responsible for compiling wildlife observation data (collected on the *Wildlife Observation Form* ([Section 9740.3.1](#))) and assessing possible effects. The USFWS and NMFS can work closely with the action agency or the SSC to provide expertise and support prior to issuing the final section 7 documentation. Final section 7 documentation may include a letter of concurrence for an incident where no take is expected to have occurred or a biological opinion for an incident where take is likely to have occurred.

¹³An emergency is a situation involving an act of God, disasters, casualties, national defense, or security emergencies, etc., and includes response activities that must be taken to prevent imminent loss of human life or property. Under no circumstances should the ESA section 7 consultation obstruct an emergency response decision made by the action agency where human life is at stake.

1 Template forms used by the USCG, NMFS, and the USFWS in Alaska for initiating and closing-out the
2 emergency ESA section 7 consultation for incident response actions are in [Section 9740.3.6](#).

3 While the timing of emergencies is unpredictable, the types of emergencies that may affect listed
4 species or designated critical habitat can be determined in advance. It is essential that during the ACP
5 planning process, Area Committees engage with USFWS and NMFS to develop or modify the ACP and
6 response strategies. By anticipating potential effects prior to implementing response actions, decisions
7 can be made rapidly during a spill, impacts to ESA-listed species from response actions can be
8 minimized, and implementation of response strategies specifically designed to protect listed species and
9 designated critical habitat can be achieved.

1 Figure 4-4: ESA Section 7 Consultation Flow Chart



2

4820 – Permits

4820.1 – Fish and Wildlife Permit Tools

Information on fish and wildlife permits can be found in Table 4-1 and Table 4-2, below, and throughout [Section 3000](#) and [Section 4000](#), notably:

- *Authorizations and Permits for Carcass Collection* ([Section 3640.2.1.1.2](#))
 - Table 3-3: Wildlife authorizations and permits for primary response strategies.
- *Authorizations and Permits for Wildlife Hazing/Deterrence* ([Section 3640.2.2.1.1](#))
- *Authorizations and Permits for Pre-emptive Capture* ([Section 3640.2.2.2.1](#))
- *Authorizations and Permits for Secondary Response Strategies* ([Section 3640.2.2.3](#))
 - Table 3-4: Wildlife authorizations and permits for secondary response strategies.
- *Authorizations and Permits for Tertiary Response Activities* ([Section 3640.2.3.2](#))
 - Table 3-5: Wildlife authorizations and permits for tertiary response strategies.
- Figure 4-1: Carcass Collection Permits Flow Chart.
- Figure 4-2: Wildlife Hazing/Deterrence Permits Flow Chart.
- Figure 4-3: Wildlife Capture, Transport, Stabilization, or Rehabilitation Permits Flow Chart.
- Figure 4-4: ESA Section 7 Consultation Flow Chart.

Table 4-1: Wildlife Authorizations and Permits Required Prior to Implementing Response Tactics

Agency ¹	Response Tactic	Migratory birds	Sea otters, walruses, and polar bears	Whales, porpoises, seals, and sea lions	Terrestrial mammals, furbearers, non-migratory birds, fish, and invertebrates	Bald or golden eagles	Threatened or endangered species
ADF&G	Boom deployment in resident or anadromous fish-bearing water body	No	No	No	Fish Habitat Permit ²	No	No ³
	Mechanical recovery	No	No	No	Fish Habitat Permit ²	No	No ³
	Non-mechanical recovery (except dispersant use)	No	No	No	No	No	No ³
USFWS	Boom deployment in resident or anadromous fish-bearing water body	No	No	No	No	No	ESA section 7 consultation ⁴
	Mechanical recovery	No	MMPA section 112(c) LOA ⁵	No	No	No	ESA section 7 consultation ⁴
	Non-mechanical recovery (except dispersant use)	No	MMPA section 112(c) LOA ⁵	No	No	No	ESA section 7 consultation ⁴
NMFS	Boom deployment in resident or anadromous fish-bearing water body	No	No	MMHSRP Permit ⁶	No	No	ESA section 7 consultation ⁴
	Mechanical recovery	No	No	MMHSRP Permit ⁶	No	No	ESA section 7 consultation ⁴
	Non-mechanical recovery (except dispersant use)	No	No	MMHSRP Permit ⁶	No	No	ESA section 7 consultation ⁴
All Agencies	Dispersant use	Agency authorization following protocols outlined in the <i>Alaska RCP</i> (Part 3. A. Chemical Dispersants)					

¹ See [Initial Emergency Contacts](#) for a list of agency personnel to contact for appropriate authorizations and permits.

² Title 16 Fish Habitat Permit required for water withdrawal from and placement of boom, anchors, or skimmers in anadromous water bodies or if fish passage is blocked in any freshwater fish-bearing water body (authority extends to mean lower low tide).

³ An ADF&G permit is required to deter, collect, or hold any species on the state endangered species list that is not on the federal endangered species list.

⁴ ESA section 7 consultation = Endangered Species Act consultation between federal agencies (i.e., USCG or EPA and USFWS or NMFS).

⁵ LOA = Letter of Authorization.

⁶ MMHSRP Permit = Marine Mammal Health and Stranding Response Program Permit. Request verbal case-by-case authorization from the NMFS Regional Stranding Program Coordinator or associated co-investigator.

Table 4-2: Wildlife Authorizations and Permits Required for Hazing/Deterring, Collecting, or Holding Wildlife

Agency ¹	Activity	Migratory birds	Sea otters, walruses, and polar bears	Whales, porpoises, seals, and sea lions	Terrestrial mammals, furbearers, and non-migratory birds	Fish, shellfish, and invertebrates	Bald or golden eagles	Threatened or endangered species
ADF&G	Carcass Collection	No	No	No	Wildlife Response Permit	Aquatic Resource Permit	No	No ²
	Deter	Wildlife Response Permit	No	No	Wildlife Response Permit	N/A	No	No ²
	Capture, Transport, Stabilize, or Rehabilitate	No	No	No	Wildlife Response Permit	N/A	No	No ²
USFWS	Carcass Collection	Migratory Bird Salvage Permit & OLE ⁴ Authorization	Permit & OLE ⁴ Authorization	No	No	No	Permit & OLE ⁴ Authorization	ESA section 7 consultation ³ & OLE ⁴ Authorization
	Deter	No	MMPA section 112(c) LOA ⁴	No	No	No	Eagle Depredation Permit	ESA section 7 consultation ³
	Capture, Transport, Stabilize, or Rehabilitate	Migratory Bird Rehab Permit	MMPA section 112(c) LOA ⁴	No	No	No	Eagle Depredation Permit	ESA section 7 consultation ³
NMFS	Carcass Collection	No	No	MMHSRP Permit ⁵	No	No	No	ESA section 7 consultation ³
	Deter	No	No	MMHSRP Permit ⁵	No	No	No	ESA section 7 consultation ³
	Capture, Transport, Stabilize, or Rehabilitate	No	No	MMHSRP Permit ⁵	No	No	No	ESA section 7 consultation ³

¹ See [Initial Emergency Contacts](#) for a list of agency personnel to contact for appropriate authorizations and permits.

² An ADF&G permit is required to deter, collect, or hold any species on the state endangered species list that is not on the federal endangered species list.

³ ESA section 7 consultation = Endangered Species Act consultation between federal agencies (i.e., USCG or EPA and USFWS or NMFS).

⁴ OLE = Office of Law Enforcement; LOA = Letter of Authorization.

⁵ MMHSRP = Marine Mammal Health and Stranding Response Program Permit. Request verbal case-by-case authorization from the NMFS Regional Stranding Program Coordinator or associated co-investigator.

9000 – APPENDICES

9700 – RESPONSE REFERENCES

9740 – Environmental, Fish & Wildlife Protection Plans

The WPG is incorporated by reference into the four Alaska ACPs as Appendix 9740. The following sections are appendices of the WPG and include:

[9740.1 – Wildlife Protection Guidelines History & Revision Process](#)

[9740.2 – Species Information](#)

[9740.2.1 – Migratory Birds](#)

[9740.2.2 – Marine Mammals](#)

[9740.2.3 – Terrestrial Mammals](#)

[9740.3 – Wildlife Response Tactics, Guidelines, and Forms](#)

[9740.3.1 – Tactic: Wildlife Reconnaissance \(Recon\)](#)

[9740.3.2 – Tactic: Collection of Small Carcasses and Documentation of Large Carcasses](#)

[9740.3.3 – Wildlife Capture Forms](#)

[9740.3.4 – Checklist: Vessel Grounding or Sinking Response](#)

[9740.3.5 – Rat Prevention Guidelines for Vessels](#)

[9740.3.6 – Initiation and Close-Out Forms for Section 7 Consultation](#)

[9740.3.7 – Wildlife Response Plans \(WRPs\)](#)

[9740.3.7.1 – Startup WRP](#)

[9740.3.7.2 – Comprehensive WRP](#)

9740.1 - Wildlife Protection Guidelines History & Revision Process

In 1987, neither the National Oil and Hazardous Substance Pollution Contingency Plan (NCP) nor the *Alaska Region Oil and Hazardous Substances Pollution Contingency Plan (Alaska Region Contingency Plan)* included guidance for responding to oiled wildlife. The ARRT established the Oiled Wildlife Working Group in September 1987 to develop guidelines that FOSCs could use during a federally funded oil spill response. The Oiled Wildlife Working Group was renamed the Wildlife Protection Working Group, then the Wildlife Protection Committee (WPC), in 1999 and 2012, respectively.

9740.1.1 – WPC Organization and WPG Versions

The WPC initially included six representatives from federal and state agencies, including the ADF&G; DOC, NOAA; USCG; DOI, USFWS; and the DOI Office of Environmental Policy and Compliance (OEPC), whose representative chairs the WPC. Representatives from NMFS and ADEC were added in 1989 and 2010, respectively. Because of outreach conducted in 1988, the WPC invited one representative from each of three stakeholder groups (environmental organizations, Native groups, and the oil industry) to provide input. In 1992 and 2009, respectively, the Prince William Sound and Cook Inlet Regional Citizens'

Advisory Councils (RCACs) and each of the 229 federally recognized tribes were invited to identify representatives to the WPC, as were Alaska-based OSROs and wildlife rehabilitation organizations.

The ARRT adopted its first charter in 2010; the WPC's ARRT-approved charter followed in 2012. The current WPC is chaired by OEPC and includes the USFWS, NMFS, and ADF&G, with support from representatives of Alaska Native groups, the environmental community, RCACs, the oil industry, OSROs, wildlife rehabilitators, and ARRT member agencies (USCG, EPA, ADEC, U.S. Forest Service, and NOAA).

The first WPG was adopted by the ARRT on December 13, 1988. These were prepared after extensive background research, discussions with 45 representatives from Alaska Native organizations, environmental groups, and the oil industry; consultation with technical experts with relevant knowledge; and consultation of secondary sources. These WPG also incorporated public and agency review comments.

Revisions of the WPG were approved by the ARRT in 1991, 1993, 1997, 2002, and 2012. This Section 9740.1 is included in the sixth revision (Version 2020), which was released for public comment in January 2020. Future substantive revisions of the WPG will also be made available for public comments and will incorporate current knowledge, procedures, and best practices for wildlife spill response.

9740.1.2 – Objectives

Initial objectives of the WPG were focused on procedures and protocols for capturing and treating oiled wildlife. The objectives evolved into three strategies to protect wildlife during a discharge or potential discharge of petroleum products: keeping oil away from wildlife, keeping wildlife away from oil, and caring for oiled wildlife. Those wildlife protection strategies are summarized and described in more detail in Sections [3620-3650](#), [4610](#), and [9740.2](#).

Based on experiences during (but not limited to) the 1989 T/V *Exxon Valdez*, 1996 M/V *Citrus*, and 2004 M/V *Selendang Ayu* oil spills, additional general wildlife protection considerations were added to the WPG to ensure that all incident response activities minimized or prevented (to the extent possible) adverse effects to wildlife in Alaska. These included: (1) introduction of rats to rat-free islands; (2) unnecessary or illegal disturbance to sensitive species and habitats such as nesting raptors, seabird rookeries, and marine mammal haulouts and pupping areas; (3) potential injury or disturbance of bears by spill response personnel; (4) illegal collection of wildlife parts by spill response personnel; and (5) exposure of wildlife to cleaning agents or bioremediation substances used for shoreline treatment.

9740.1.3 – WPG and Contingency Planning in Alaska

Plans for oil spill response in Alaska included the 1994 *Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Discharges/Releases (Unified Plan)*, with 10 subarea plans, which fulfilled the requirements of the *Alaska Region Contingency Plan (Alaska RCP)* as set forth by the NCP. At that time, the WPG were included in the *Unified Plan*. A USCG-directed transition from the *Unified Plan* to more clearly delineate USCG and EPA jurisdiction within area plans resulted in the 2018 *Alaska RCP* and four Area Contingency Plans (ACPs). Because of the nationally directed content limitations of the *Alaska RCP* and the logistical challenges of inclusion in four ACPs, the WPG was not incorporated into these planning documents. Instead, the WPG is organized and numbered to match the structure of the four ACPs and is incorporated by reference into the four ACPs.

1 9740.1.4 – Related Wildlife Plans

2 The Pribilof Islands Wildlife Protection Subgroup developed specific protection guidelines for migratory
3 birds and fur seals in the Pribilof Islands in 1998. The *Wildlife Protection Guidelines: Pribilof Islands*
4 (*Pribilof Guidelines*) can be found on the ADEC [Aleutians Subarea Plan](#) web page.

5 In 1999, a joint Canada-U.S. Dixon Entrance (CANUSDIX) Wildlife Response Working Group (including
6 U.S. and Canadian federal, state, and provincial wildlife agency representatives) developed a wildlife
7 response plan, consistent with the WPG, focused on migratory birds and sea otters in the Dixon
8 Entrance trans-boundary area between Alaska and British Columbia in 2003. The *Canada-United States*
9 *Marine Spill Pollution Contingency Plan CANUSDIX Annex-Operation Appendix: Wildlife Response*
10 *Guidelines* are currently being revised.

9740.2 – Species Information

9740.2.1 – Migratory Birds

9740.2.1.1 – Migratory Bird Protection Priorities

There are over 160 species of marine birds in Alaska (loons and grebes, seabirds, shorebirds, and waterfowl). Many of these marine birds also spend time on inland waters, particularly during the breeding season. Prioritized response strategies for different species or species groups may be established on an incident-specific basis.

Species may be prioritized in the planning area based on whether:

1. The species, or species group, is known to be particularly vulnerable to impacts from an oil spill (Table 9-1). In general, vulnerability to oil spills correlates with time spent on or near the water. For example:
 - a. Seabirds (such as puffins, murres, auklets, petrels, shearwaters, kittiwakes, cormorants, albatrosses, and gulls) are found on the oceans from the coast to the high seas; most are on shore only during nesting season.
 - b. Waterfowl (geese, swans, and ducks) and diving birds (loons, grebes) – often in nearshore waters; use shore for nesting and waterfowl use it for resting.
 - c. Shorebirds (such as sandpipers and turnstones) – generally on shore (tidal mudflats and rocks).
 - d. Raptors (such as bald eagles and peregrine falcons) would generally not be considered susceptible, except when feeding on marine birds or scavenging oiled carcasses.
2. The species in the planning area represents a significant proportion of the species' total world population.
3. The species has been given a special status by state or federal agencies.
4. The species is an important subsistence resource.

Specific habitats may also be prioritized (Table 9-2).

Priority bird species by geographic area are shown in Table 9-3.

Table 9-1: Bird Species Group Susceptibility to Oiling.

Species Group	Susceptibility to Oiling
Alcids (murres, puffins)	High
Ducks, geese, and swans	
Sea and bay ducks	
Loons and Grebes	
Raptors (feeding in coastal environments)	
Cormorants	Medium
Gulls	
Waders (herons, egrets, bitterns)	
Cranes	Low
Plovers, sandpipers	
Songbirds	
Raptors	
Pelagic birds (albatross, petrels, fulmars)	

Table 9-2: Important Bird Habitats that Are High Priority Protection Areas, Depending on Season.

Habitat	Characteristics and Specific Locations	Seasons Used
Staging Areas	<p>Birds congregate in migration stopover areas in immense flocks during spring and fall migrations. Shorebirds and waterfowl gather at lagoons and estuaries to feed.</p> <p>Critical areas in the spring include: Copper River Delta, Izembek Lagoon, Kachemak Bay, parts of Cook Inlet and Prince William Sound, Bristol Bay estuaries, and the Stikine River Delta. Critical areas in the fall include: Izembek Lagoon, Bristol Bay estuaries, parts of the Yukon Kuskokwim Delta and Cook Inlet, and lagoons of the Beaufort and Chukchi Sea coasts.</p> <p>In addition, migrating seabirds are concentrated at Unimak Pass and waterfowl (e.g., spectacled eiders) are concentrated in Ledyard Bay during the spring and fall.</p>	Spring, Fall
Seabird Colonies	<p>Alaska seabirds nest in over 1,300 colonies in the spring and summer. The number of seabirds in these colonies ranges from a few dozen to several million birds.</p> <p>Birds are vulnerable to oil contamination when they are in large flocks on the water near the colony. Highest priority will need to be given to colonies containing rare species, the largest colonies in a region, and those with higher species diversity.</p>	Summer
Pelagic Seabird Feeding Areas	<p>Most seabirds obtain their food at sea away from land. While they may feed in areas that are close to land or more than 100 miles offshore, they are often concentrated in small areas. As a result, the presence of oil in some feeding areas could negatively affect the majority of seabirds in the region.</p> <p>Feeding areas shift with the tides and seasons.</p>	All year
Wintering Areas	<p>These include the sheltered ice-free inlets of southern Alaska, especially around Kodiak Island, Prince William Sound, and southeastern Alaska; localized parts of the Aleutian Islands and Bering Sea; and the edge of the ice pack as well as open leads in the pack ice.</p> <p>Other important coastal habitats such as marshes, estuaries, and lagoons are sensitive to oil contamination and will need to be protected even when no birds are present.</p>	Winter; all year

Table 9-3: Status¹ of Avian Species of Concern by Geographic Zone in Alaska. Criteria for inclusion are: The population of the species in the planning area represents a significant proportion of the species' total world population; the species, or species group, is known to be particularly vulnerable to impacts from an oil spill; the species has been given a special status by state or federal agencies; or the species is an important subsistence resource.

Species (Species Group) ²	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope	Interior
Yellow-billed Loon (DB)	P	P	P	P	P	--	--	P	P	--
Loons (other) (DB)	P	P / S	P / S	P	P	P	P / S	P / S	P / S	P
Grebes (DB)	P	P	P	P	P	P	--	P / S	A	P
Trumpeter Swans (WF)	U	P / S	P / S	A	A	A	A	R	--	P / S
Tundra Swans (WF)	P	P / S	P / S	P	P	P / S	P / S	P / S	P / S	P / S
Greater White-fronted Goose (WF)	U	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S
Snow Goose (WF)	U	P	P / S	P / S	P	P / S	P / S	P / S	P / S	P / S
Emperor Goose (WF)	A	U	U	P / S	P / S	P / S	P / S	P / S	R / S	P / S
Black Brant (WF)	U	P	P / S	P / S	P	P / S	P / S	P / S	P / S	A
Canada Goose (WF)	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S
Aleutian Canada Goose (WF)	--	--	--	--	P	--	--	--	--	--
Cackling Canada Goose (WF)	--	--	--	--	S	S	P / S	--	--	P / S
Dusky Canada Goose (WF)	--	P	--	--	--	--	--	--	--	--
Long-tailed Duck (WF)	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S
Greater Scaup (WF)	P / S	P / S	P / S	P / S	P	P / S	P / S	P / S	U / S	P / S
Common Merganser (WF)	P	P / S	P / S	P	P	P	R	R	--	R
Red-breasted Merganser (WF)	P	P	P	P	P / S	P / S	P / S	P / S	R / S	R
Northern Pintail (WF)	P / S	P / S	P / S	P	P	P / S	P / S	P / S	P / S	P / S
Bufflehead (WF)	P / S	P / S	P / S	P	P / S	P / S	R / S	R / S	A	P / S
Goldeneye (WF)	P / S	P / S	P / S	P	P / S	P / S	U / S	U / S	A	P / S

¹ P = Present; U = Uncommon; R = Rare; O = Pelagic (well offshore); S = Subsistence Species; A = Accidental; CS = Candidate Species; TS = Threatened Species; ES = Endangered Species; ES? = Thought to be extinct; SES = State Endangered Species

² WF = Waterfowl, SE = seabird, DB = other diving bird, SH = shorebird, RA = raptor, UB = upland bird

Species (Species Group) ²	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope	Interior
Canvasback (WF)	U	U / S	U	R	R	R	R	R	A	P / S
Northern Shoveler (WF)	U	P	P	R	R	R	U / S	U	R	P / S
Spectacled Eider (WF)	A (TS)	A (TS)	A (TS)	R (TS)	R (TS)	P (TS)	P (TS)	P (TS)	U / S (TS)	--
Steller's Eider (WF)	R (TS)	R (TS)	P (TS)	P (TS)	P (TS)	P (TS)	U (TS)	U (TS)	U / S (TS)	--
King Eider (WF)	R	U	U	P	P / S	P	P	P / S	P / S	--
Common Eider (WF)	R	U	U	P	P / S	P / S	P / S	P / S	P / S	--
Harlequin Duck (WF)	P / S	P / S	P / S	P / S	P / S	P / S	U / S	U / S	R	U
American Widgeon (WF)	P / S	P / S	P / S	P	P	P / S	P / S	P / S	U / S	P / S
Green-winged Teal (WF)	P / S	P / S	P / S	P	P / S	P / S	P / S	P / S	U / S	P / S
Scoter (WF)	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	U / S	P / S
Mallard (WF)	P / S	P / S	P / S	P	P / S	P / S	P / S	P / S	R / S	P / S
Bald Eagles (RA)	P	P	P	P	P	P	R	R	A	P
Northern Goshawk (RA)	U	U	U	U	U	U	R	R	--	P
Queen Charlotte Goshawk (RA)	T	--	--	--	--	--	--	--	--	--
Osprey (RA)	R	R	R	R	R	R	R	R	A	R
American Peregrine Falcon (RA)	P	P	P	P	P	U	P	--	--	P
Arctic Peregrine Falcon (RA)	P	P	P	P	P	P	P	P	P	P
Peale's Peregrine Falcon (RA)	P	P	P	P	P	--	--	--	--	--
Snowy Owl (RA)	R	U	U	U	U	U	U	U	U / S	R
Sandhill Crane (SH)	P / S	P / S	P / S	P	P	P / S	P / S	P / S	U / S	P / S
Wandering Tattler (SH)	U	P	P	U	U	U	U	U	A	U
Bristle-thighed Curlew (SH)	A	A	A	R	R	R	U	U	R	A

¹ P = Present; U = Uncommon; R = Rare; O = Pelagic (well offshore); S = Subsistence Species; A = Accidental; CS = Candidate Species; TS = Threatened Species; ES = Endangered Species; ES? = Thought to be extinct; SES = State Endangered Species

² WF = Waterfowl, SE = seabird, DB = other diving bird, SH= shorebird, RA = raptor, UB = upland bird

Species (Species Group) ²	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope	Interior
Eskimo Curlew (SH)	--	--	--	--	--	--	ES? / SES	--	--	ES? / SES
Oystercatcher (SH)	P	P / S	P	P	P / S	P / S	/S	--	--	--
American Golden Plover (SH)	U	P	P	P	P	P	P / S	P / S	P	P
Semipalmated Plover (SH)	P	P	P	P	P	P	P / S	P / S	U	P
Aleutian Tern (SE)	A	U	U	U	R	U	U	U	A	--
Arctic Tern (SE)	P / S	P / S	P	P	P	P	P / S	P / S	U	P
Gulls (SE)	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P
Murres (SE)	P	P	P	P	P / S	P	P / S	P / S	P / S	A
Guillemots (SE)	P	P	P	P	P	P	P	P	U	A
Murrelets (SE)	P	P	P	P	P / S	P / S	U / S	U	R	--
Marbled Murrelet (SE)	P	P	P	U	U	U	A	A	--	--
Kittlitz's Murrelet (SE)	U / CS	P / CS	P / CS	U / CS	U / CS	U / CS	U / CS	U / CS	R / CS	--
Auklets (SE)	U	U	U	P	P / S	P	P / S	P / S	--	--
Puffins (SE)	U	P	P	P	P / S	P / S	P / S	P / S	R	--
Northern Fulmar (SE)	U	P	P	P	P	P	P	P	R	--
Red-legged Kittiwake (SE)	--	R	R	P	P / S	P	R	R	--	A
Black-legged Kittiwake (SE)	U / S	P	P	P	P / S	P	P / S	P / S	P	A
Cormorants (SE)	P	P / S	P	P	P / S	P	P / S	P / S	R	A
Short-tailed Albatross (SE)	A / O / ES / SES	A / ES / SES	A / ES / SES	A / ES / SES	A / ES / SES	A / ES / SES	A / ES / SES	A / ES	--	--
Grouse (UB)	P	U / S	U / S	R	R	R / S	R / S	R / S	--	P / S
Ptarmigan (UB)	P	P / S	P / S	P	P	P / S	P / S	P / S	P / S	P / S

¹ P = Present; U = Uncommon; R = Rare; O = Pelagic (well offshore); S = Subsistence Species; A = Accidental; CS = Candidate Species; TS = Threatened Species; ES = Endangered Species; ES? = Thought to be extinct; SES = State Endangered Species

² WF = Waterfowl, SE = seabird, DB = other diving bird, SH= shorebird, RA = raptor, UB = upland bird

9740.2.1.2 – Migratory Bird Response Strategies

Untreated oiled birds often die. Feather oiling results in compromised ability to thermoregulate and subsequent hypothermia, which can prove deadly in the cold waters of Alaska. Depending on the type of oil and its toxicity, birds can also suffer toxic effects through dermal contact with oil, ingestion of oiled prey, or ingestion of oil during preening of oiled feathers.

Birds exhibit obvious immediate behavioral changes in response to exposure to oil. In particular, they preen excessively to clean oil from their feathers. Excessive preening may cause them to abandon normal feeding, nesting, and movement, resulting in weakness and increased vulnerability to hypothermia and predation. Marine birds may move to land and become more vulnerable to predation. Oil on breeding birds' feathers can be transferred to eggs and result in embryo death. Dermal contact with oil can cause burns and lesions. These burns and lesions may become infected or alter feather structure in growing feathers. Ingested oil can affect birds' metabolic processes, potentially resulting in long-term, chronic effects even after no apparent oil is present.

The severity of oiling impacts on birds will depend on many factors including, but not limited to:

- Degree of oiling and length of exposure.
- Health of the birds prior to exposure.
- Toxicity of the product spilled.
- Distribution of the spilled product in the environment.

9740.2.1.2.1 – Primary Response

Primary response strategies emphasize preventing oil from reaching birds or their concentration areas through mechanical cleanup, on-water recovery (skimming), booms, *in-situ* burning, or dispersant, herder, or other chemical use. Mechanical cleanup and recovery are preferable to avoid air quality issues with in-situ burning, and exposure to additional chemicals including dispersants or dispersed oil. (Additional information on effects of dispersants on birds can be found in Coastal Response Research Center (CRRC), [2018 State of the Science of Dispersants and Dispersed Oil \(DDO\) in U.S. Arctic Waters: Ecotoxicity and Sublethal Impacts.](#)) *In-situ* burns and dispersant use will be used under procedures outlined in the *Alaska RCP*, Parts 3. A. (Chemical Dispersants) and 3.B. (*In Situ* Burning).

Oiled debris and oiled wildlife carcasses will need to be removed from the environment as soon as possible to prevent secondary contamination of scavengers, including raptors. Secondary contamination can occur through (1) ingestion of oily carcasses and (2) physical contact with oil on carcasses or other oiled debris. See [Section 3640.2.1.1](#) and the *Tactic: Collection of Small Carcasses and Documentation of Large Carcasses* ([Section 9740.3.2](#)) for additional information on carcass collection.

9740.2.1.2.2 – Secondary Response

Secondary response strategies emphasize keeping birds away from oiled areas by deterrence, moving birds from oiled areas using hazing, and pre-emptive capture, holding, and release of unoiled birds.

9740.2.1.2.2.1 – Deterrence Activities

Deterrent techniques can be used to discourage birds from landing in or near an oil-contaminated area. If warranted, deterrence activities should be initiated as soon as possible following an oil spill to prevent birds from establishing or continuing regular use patterns within a contaminated area. The choice of an

appropriate method will depend on incident-specific considerations, such as: the type of oil spilled, time of year, species in the area, and availability of appropriate equipment, materials, and trained personnel. A summary of deterrent methods, including a discussion of their effectiveness and their limitations, can be found in *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the ADEC [Area Plan References and Tools](#) web page.

Any deterrence activity should ensure there is nearby clean, safe habitat to which birds may move.

Because many deterrence techniques work by startling or frightening birds, they may acclimate, with effectiveness declining over time. Evaluate deterrence effectiveness frequently.

Bird deterrence includes passive and active hazing methods. Passive hazing employs the use of visual devices that depend on wind-generated movement to create a disturbance, such as human effigies, predator models, flags, balloons, and reflective tape. These devices can be deployed and left unattended for short periods of time, but should be checked at least once per day and during and after high wind or wave events. Active hazing includes noise-generating devices, such as gas-operated exploders, pyrotechnics, and electronic sound generators; and use of boats, aircraft, and all-terrain vehicles. Active hazing generally requires more on-site attendance. Physical barriers (e.g., netting or fencing) may also be used to minimize or prevent birds from contacting oil, and have been used for terrestrial incidents affecting wetlands and oil storage pits.

Only individuals trained and certified in bird deterrence techniques by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service within the last three years will be authorized to conduct migratory bird deterrence activities. Required oversight for migratory bird deterrence activities will be conducted by ADF&G and USFWS.

Bird Deterrence Forms and Tools:

- Request authorization to conduct bird deterrence in Startup or Comprehensive WRPs ([Section 3650](#); [Section 9740.3.7](#)).
- Permits required for conducting bird deterrence activities are listed in Table 4-2.
- Any deterrence activities for ESA-listed birds will be addressed via FOSC ESA consultation with USFWS ([Section 4810](#)).
- Best Practices for Migratory Bird Care during Oil Spill Response, available on the DEC [Area Plan References and Tools](#) web page.

9740.2.1.2.2.2 – Pre-emptive Capture

Pre-emptive capture includes the capturing, handling, transporting, short-term holding, and releasing of healthy, uncontaminated wildlife. The greatest utility of pre-emptive capture for birds may be during migration (when large flocks of birds are present) and during flightless (molting) periods (when bird deterrence is not likely to be successful). When conducting pre-emptive capture, considerations should be made for human safety, bird safety, and minimizing transportation and holding times. Appropriate release location(s) should be identified and approved prior to beginning a pre-emptive capture.

Bird Pre-Emptive Capture Forms and Tools:

- Request authorization to conduct pre-emptive capture in Startup or Comprehensive WRPs ([Section 3650](#); [Section 9740.3.7](#)).
- Permits required for conducting pre-emptive capture are listed in Table 4-2.

- Any pre-emptive capture of ESA-listed birds will be addressed via FOSC ESA consultation with USFWS ([Section 4810](#)).
- *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the DEC [Area Plan References and Tools](#) web page.

9740.2.1.3 – Tertiary Response

Tertiary response strategies will be considered when birds become oiled. Tertiary response includes the capturing, handling, transporting, rehabilitating, holding, and releasing of oiled birds. The USFWS policy document *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the ADEC [Area Plan References and Tools](#) web page, provides detailed information for tertiary response activities.

When oiled birds are captured alive, stabilized, and taken to rehabilitation centers, they can often be cleaned and released back into their natural habitat. Initiating a capture, stabilization, and rehabilitation program as soon as possible after a spill occurs may reduce the severity of impact to birds from oiling and increase survival for oiled birds.

Tertiary response effectiveness will be influenced by time of year, type and amount of material spilled, species involved, local terrain, tides, availability of trained personnel, and weather. A variety of capture methods and techniques (e.g., including dip nets, net guns, mist nets, foot traps, and spotlighting) may be used to maximize capture success. Captured birds will need to be stabilized and receive medical evaluation and preliminary treatment as quickly as possible. Stabilization will likely occur at a remote location prior to transporting birds to a central rehabilitation center.

The goal of rehabilitating oiled birds is the release of a healthy bird back into its natural environment. Release will likely involve transporting birds from the rehabilitation center to a location near the initial capture site. Rehabilitated oiled birds of species that may be harvested for subsistence purposes will have an “OILED-TREATED” leg band placed on them prior to release.

Oiled Bird Capture, Stabilization, and Rehabilitation Forms and Tools:

- Request authorization to conduct oiled bird capture in Startup or Comprehensive WRPs ([Section 3650](#); [Section 9740.3.7](#)).
- Permits required for conducting capture are listed in Table 4-2.
- Any capture of ESA-listed birds will be addressed via FOSC ESA consultation with USFWS ([Section 4810](#)).
- *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the DEC [Area Plan References and Tools](#) web page.

9740.2.2 – Marine Mammals

9740.2.2.1 – Marine Mammal Protection Priorities

Spill response activities – including carcass collection, hazing/deterrence, capture, and cleaning – of marine mammals are complicated by the large size of marine mammals, mammalian zoonotic diseases (diseases that can be transmitted between animals and humans), and heightened safety concerns for response personnel working in the marine environment.

Marine mammals can exhibit highly variable responses to spilled oil due to differences among marine mammal species, age classes, and habitats. For example, direct exposure to oil can result in conjunctivitis, whereas ingestion of oil can result in digestive tract bleeding and liver and kidney damage. Ingestion of oil is of greater concern for species with fur that groom themselves with their mouths, such as polar bears and sea otters. Inhalation of hydrocarbon volatiles (fumes) can result in nerve damage, behavioral abnormalities, mortality, and long-term impacts to reproductive success.

Prioritized response strategies for different species or species groups may be established on an incident-specific basis. Species may be prioritized in the planning area based on whether:

1. The species, or species group, is known to be particularly vulnerable to oil impacts.
2. The species in the planning area represents a significant proportion of the species' total world population.
3. The species has been given a special status by state or federal agencies.
4. The species is an important subsistence resource.

Specific habitats may also be prioritized. Table 9-4 shows priority species by geographic area.

Table 9-4: Status¹ of Marine Mammals by Geographic Zone in Alaska. Criteria for inclusion are: The population of the species in the planning area represents a significant proportion of the species' total world population; the species, or species group, is known to be particularly vulnerable to impacts from an oil spill; the species has been given a special status by state or federal agencies; or the species is an important subsistence resource.

Species ²	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope
Sea Otter	P / S	P / S	P / S / TS	P / S / TS	P / S / TS	P / S / TS	--	--	--
Polar Bear	--	--	--	--	--	--	--	P / S / TS	P / S / TS
Northern Fur Seal	O	O	O	U (nearshore) / O	P / S	O (Gulf side)	O	--	--
Steller Sea Lion	P / S / ES	P / S / ES	P / S / ES	P / S / ES	P / S / ES	P / S / ES	U / S / ES	U / S / ES	--
Ringed Seal	--	--	--	--	R / S / TS	U / S / TS	P / TS / S	P / T / S	P / T / S
Harbor Seal	P / S	P / S	P / S	P / S	P / S	P / S	U / S	--	--
Spotted Seal	--	--	--	--	P / S	P / S	P / S	P / S	P / S
Bearded Seal	--	--	--	--	R / S / TS	U / S / TS	P / S / TS	P / S / TS	P / S / TS
Pacific Walrus	--	--	--	--	P / S	P / S	P / S	P / S	P / S
Ribbon Seal	--	--	--	--	O	--	O	P (pack ice) / S	P (pack ice) / S
Bowhead Whale	--	--	--	--	U / ES	--	P / ES	P / S / ES	P / S / ES
Gray Whale	U / ES	P / ES	P / ES	P / ES	P / ES	P / ES	P / ES	P	P
Fin Whale	P / ES	P / ES	O / ES	P / ES	P / ES	R / ES	P / ES	U / ES	U / ES
Humpback Whale	P / TS / SES	P / TS / SES	P / ES / SES	P / ES / SES	P / ES / SES	P / ES / SES	P / ES / SES	P / ES / SES	U / ES
Minke Whale	P	P	P	P	P	P	P	P	U

¹ P = Present; U = Uncommon; R = Rare; O = Pelagic (well offshore); S = Subsistence Species; A = Accidental; CS = Candidate Species; TS = Threatened Species; ES = Endangered Species; SES = State Endangered Species

² USFWS manages polar bears, sea otters, and walrus; all other marine mammals are managed by NMFS.

Species ²	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope
Beluga Whale	R	A	P / S / ES	--	R	P / S	P / S	P / S	P / S
Killer Whale	P	P	P	P	P	P	P	P	P
Harbor Porpoise	P	P	P	P	P	P	P	P	P
Dall's Porpoise	P	P	P	P	P	P	P	R	--
Pacific White-Sided Dolphin	O	O	O	U (nearshore) / O	U (nearshore) / O	--	--	--	--
Blue Whale	U / ES / SES	O / ES / SES	O / ES / SES	O / ES / SES	P / ES / SES	--	U / ES / SES	--	--
North Pacific Right Whale	O / R / ES / SES	O / R / ES / SES	O / R / ES / SES	U / ES / SES	P / ES / SES	P / ES / SES	R / ES / SES	R / ES / SES	--
Sei Whale	O / ES	P / ES	O / ES	P / ES	P / ES	--	--	--	--
Sperm Whale	P / ES	P / ES	O / ES	P / ES	P / ES	--	P / ES	O / R / ES	--
Baird's Beaked Whale	O	O	O	O	P	--	--	--	--
Cuvier's Beaked Whale	O	O	O	O	P	--	--	--	--
Stejneger's Beaked Whale	O	O	O	P	P	--	--	--	--
California Sea Lion	U	R	--	R	--	--	--	--	--
Northern Elephant Seal	U	O	O	O	P (nearshore) / O	--	--	--	--

¹ P = Present; U = Uncommon; R = Rare; O = Pelagic (well offshore); S = Subsistence Species; A = Accidental; CS = Candidate Species; TS = Threatened Species; ES = Endangered Species; SES = State Endangered Species

² USFWS manages polar bears, sea otters, and walrus; all other marine mammals are managed by NMFS.

9740.2.2.2 – Marine Mammal Response Strategies

9740.2.2.2.1 – Primary Response

Primary response strategies, especially controlling and containing the oil release, is of utmost importance to marine mammals and their habitats. Priority protection areas include pinniped haulout and rookery beaches, particularly for species, such as Northern fur seals and Steller sea lions, which form male-harem bonds and have strong territorial attachment to specific rookery sites. For those species, using secondary or tertiary response strategies is probably not feasible during specific periods, such as the breeding season, when territorial bonding is strong.

Species of pinnipeds that do not form male-harem bonds often haul-out in more protected, lower-energy shoreline areas or on ice, which could be more susceptible to oiling and less likely to be cleaned by natural forces. Haulout shorelines and ice areas for these species should also be given priority protection and high priority for cleaning activities if those areas become oiled. Consideration should also be given to the timing of pupping and molting.

All other response activities should avoid marine mammals to prevent disturbance to them, especially at pinniped haulout and rookery beaches. Disturbance of haulout and rookery beaches can result in mass stampedes of the animals, particularly into the ocean. Stampedes can result in severe impacts, including direct physical injury and death of pups or weak animals; separation of mothers and pups; disturbance of established social hierarchies; movement to areas with less favorable conditions; or beach abandonment. The distance at which animals are disturbed depends on the type and intensity of response activities, local visibility, and the species. Wildlife agencies can provide guidance regarding species-specific responses to disturbance and recommended buffers around sensitive areas.

Primary response strategies also include removal of oiled carcasses from the environment to prevent predators (such as polar bears) from ingesting oil as they scavenge for food.

If primary response strategies are proposed in locations where marine mammals are or may be present, the FOSC will need to immediately consult with NMFS and USFWS regarding the proposed response strategies to ensure compliance with the MMPA and ESA ([Section 4810](#)). Information on wildlife agency permits required for conducting response activities affecting marine mammals is in Table 4-2.

9740.2.2.2.2 – Secondary Response

Secondary response strategies emphasize keeping potentially affected wildlife away from oiled areas using deterrent techniques. For marine mammals, this includes herding animals away from oil on the water or from oil-contaminated near-shore and beach areas. This is most feasible for pinnipeds at haulout and rookery areas during the period when territorial bonding is weakest (i.e., before pupping and after weaning).

It is difficult to use deterrent techniques effectively for marine mammals because they can become habituated to noise quickly and they will often investigate new additions to their environment. Additionally, sea otters and some pinnipeds are naturally curious and may approach to investigate a new noise or activity.

Secondary response strategies also include the pre-emptive capture and subsequent handling, transportation, short-term holding, and release of unoiled wildlife. This response strategy may be used for sea otters, small numbers of fur seals and other pinniped species, and polar bears. Secondary response strategies must be performed only by people with experience in capturing and handling the

subject species. These activities should not be undertaken lightly because the danger of shock and stress to an animal from being captured and relocated may far outweigh the potential for an animal to become oiled.

Responders should work under an approved Startup or Comprehensive WRP ([Section 9740.3.7](#)) to conduct deterrence, or a Comprehensive WRP ([Section 9740.3.7](#)) to conduct pre-emptive capture of marine mammals. Information on wildlife agency permits required for conducting marine mammal pre-emptive capture is found in Table 4-2. Any pre-emptive capture-related activities for marine mammals that are ESA-listed will be addressed via FOSC ESA consultation with USFWS and NMFS.

9740.2.2.2.3 – Tertiary Response

Tertiary response strategies include the capturing, handling, transporting, stabilizing, rehabilitating, and releasing of oiled animals. This must be performed only by people with experience in capturing and handling the subject species. Due to the size and the remoteness of many areas in Alaska, capture and cleaning of marine mammals may not be practical or beneficial due to a lack of equipment, trained personnel, and facilities. Safety of the animals and the human handlers must be of utmost importance. Only after primary and secondary strategies have been employed should tertiary response strategies be considered. Tertiary response strategies should only be considered if it is determined that the probable survival of the oiled marine mammals is very low, and the likelihood of successful rehabilitation is high.

Responders should work under an approved Startup or Comprehensive WRP ([Section 9740.3.7](#)) to conduct tertiary response strategies for oiled marine mammals. Information on wildlife agency permits required for conducting oiled marine mammal capture and related activities is found in Table 4-2. Any capture-related activities for marine mammals that are ESA-listed will be addressed via FOSC ESA consultation with USFWS and NMFS, and all marine mammals are protected under the MMPA.

Additional information on spill response for pinnipeds and cetaceans can be found in NMFS 1) *Pinniped and Cetacean Oil Spill Response Guidelines*, 2) *Arctic Marine Mammal Disaster Response Guidelines*, and 3) *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, all available on [NOAA Institutional Repository](#).

Additional information on spill response for polar bears can be found in the USFWS *Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page.

The USFWS is currently updating the USFWS Oil Spill Response Plan for Sea Otters in Alaska. It will be available on the ADEC [Area Plan References and Tools](#) web page when finalized.

9740.2.2.3 – Marine Mammal Information by Species

9740.2.2.3.1 – Sea Otters

Sea otters are extremely vulnerable to oil spills, regardless of age, because of their small size, dependence on fur rather than blubber for insulation, and heavy use of near shore habitats. The southwest Alaska distinct population segment (DPS) of the northern sea otter was listed as threatened under the ESA in 2005. All sea otters in Alaska are also protected under the MMPA.

Because sea otters do not have layers of blubber they rely on their fur for insulation. Oiling of more than a small portion of their fur can result in rapid death from hypothermia. If oiled fur is not severe enough to cause death from hypothermia, sea otters will spend a great deal of time grooming in an attempt to remove the oil and maintain their fur. Sea otters have high metabolic requirements and the additional time spent grooming can increase metabolic needs, reduce foraging time, and lead to lowered metabolic efficiency. If unresolved, this condition will result in starvation and death. Ingestion of hydrocarbons during the grooming process or through feeding on oiled prey items can result in digestive-tract irritation, neurological effects, and physiological changes, which in turn, can lead to organ injury, dysfunction, and death. Aromatic hydrocarbons can cause inhalation injury and death before either hypothermia or ingestion affects the animals.

9740.2.2.3.1.1 – Response Strategies

Primary response strategies – preventing oil from reaching sea otter pupping, feeding, and other sea otter concentration or sensitive areas – should be emphasized for sea otters because of their vulnerability to oiling.

Sea otters use a variety of terrain (including ice) to haul-out. Haulouts may be used to escape predators or rough weather, or be established near rich prey areas. Protection strategies will be based on the terrain on which haulouts are identified.

Pupping areas are difficult to define and protect because most sea otters give birth in either open water or near kelp beds, which have undefined boundaries. If pupping areas are identified, booms will need to be placed far enough away to minimize disturbance and prevent driving sea otters into oiled areas.

Sea otters forage in rocky substrate and soft bottom communities, as well as in and around kelp. Special emphasis will need to also be placed on feeding areas containing intertidal and shallow subtidal prey species used by sea otters. Any low- to moderate-energy beaches with mussel beds or prey resources used by sea otters should receive priority protection.

Sea otters are highly variable in their response to disturbance, including exhibiting curiosity to something new in their environment. Response-related disturbance may drive sea otters into oiled areas. Sea otter response to all response activities should be monitored by Wildlife Observers.

Primary response strategies may also include sea otter carcass collection.

Secondary Response Activities. The use of deterrence (e.g., auditory, visual, olfactory, and/or herding) to either attract or disperse sea otters has been found to be ineffective because sea otters habituate readily to noise and other distractions associated with human activity. Although slight behavioral modifications have been observed in response to deterrence activities, the modification and duration of the effect were inadequate for protecting sea otters from potential impacts of an oil spill. Of the possible deterrent techniques, auditory deterrence such as propane cannons may have some application for short-term attempts to keep sea otters off oiled haulouts. In general, sea otter hazing

from oiled areas will not be authorized unless the hazing will be conducted by someone who is very familiar with sea otter behavior and who can judge the effectiveness of the hazing/deterrence technique in real time.

Pre-emptive capture may be a viable strategy for moving sea otters away from areas contaminated by oil, especially if small numbers of sea otters have a high potential for being oiled. Principal concerns when capturing and handling sea otters are minimizing transportation and holding times and clear communication between capture teams and receiving facility staff. Sea otters in captivity should be regarded as dangerous to response personnel and sea otters need to be handled as little as possible during response operations. Handling will need to be conducted by qualified personnel who have documented experience in sea otter capture.

Sea otter safety during capture and holding should focus on stress reduction, by:

- Having the equipment necessary to handle and transport animals as quickly and efficiently as possible;
- Reducing the number of vessels used to capture animals in a given area;
- Avoiding unnecessary noise and disturbance;
- Never pursuing a sea otter to the point of exhaustion;
- Providing thermoregulatory monitoring and ambient temperatures; and
- Minimizing contact with animals, understanding that veterinary care must be provided.

Tertiary Response Strategies. Capturing, handling, transporting, stabilizing, rehabilitating, and releasing oiled animals must be performed only by people with documented experience in capturing and handling oiled sea otters. This response strategy was first initiated in Prince William Sound and the Gulf of Alaska following the March 24, 1989, T/V *Exxon Valdez* spill and other spills along the Pacific coast. Procedures and protocols may be found in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.

9740.2.2.3.1.2 – Sea Otter Response Forms and Tools

Sea Otter Primary Response Strategies Forms and Tools:

- Request authorization to conduct sea otter carcass collection in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting primary response activities that may affect otters are shown in Table 4-2.

Sea Otter Secondary Response Strategies Forms and Tools:

- Request authorization to conduct sea otter pre-emptive capture and holding in Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting sea otter deterrence or pre-emptive capture and holding are listed in Table 4-2.
- Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.

Sea Otter Tertiary Response Strategies Forms and Tools:

- Request authorization to conduct oiled sea otter capture, transport, stabilization, and rehabilitation in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting oiled sea otter capture and related activities are listed in Table 4-2.
- Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.

If primary, secondary, or tertiary response strategies are proposed in locations where northern sea otters are or may be present, the FOSC will need to immediately consult with USFWS regarding the proposed response strategies to ensure compliance with the MMPA and ESA ([Section 4810](#)).

Information on wildlife agency permits required for conducting response activities affecting sea otters is in Table 4-2.

9740.2.2.3.2 – Pinnipeds

In general, capture and rehabilitation of oiled pinnipeds must only be attempted by trained handlers. Adult male pinnipeds, especially Steller sea lions, Northern fur seals, and Pacific walrus, may be too aggressive to safely capture and clean. While cleaning shorelines or beaches of pinniped rookeries is not recommended during the pupping and breeding seasons, appropriate wildlife agencies may recommend cleaning of heavily oiled haul-out beaches to help prevent pinniped oiling.

The following pinnipeds are specifically discussed in this appendix:

- Northern fur seals
- Steller sea lions
- Ringed seals
- Harbor seals
- Spotted seals
- Bearded seals
- Ribbon seals
- Pacific walruses

Northern elephant seals are reported only occasionally in Alaska's waters during the summer, primarily from Southeast Alaska to Prince William Sound. Northern elephant seals do not breed in Alaska.

Therefore, because of its limited presence in Alaska and the very low probability of the species being threatened by oil spills in Alaska's waters, Northern elephant seals are not discussed in the following sections.

9740.2.2.3.2.1 – Northern Fur Seals

The Pribilof Islands provide breeding grounds for approximately 50 percent of the world's population of Northern fur seals. Hundreds of thousands of these animals return to the Pribilofs each summer to give birth and breed. The world population of the Northern fur seal is estimated at 1.1 million. The U.S. population of Northern fur seals has declined by over 60 percent in recent decades from over 2 million in the 1970s, to an estimated 687,000 in 2006. The species is currently listed as depleted under the MMPA. The Pribilof fur seal population has declined about 5 percent annually during the last decade. Northern fur seals also breed on Bogoslof Island in the central Aleutian Islands and their population has

grown significantly in the past decade. Almost 20,000 Northern fur seal pups were born on Bogoslof Island in 2011 and the total population may be near 100,000 individuals occupying the island during the summer and fall.

Northern fur seals are highly migratory and range along a broad arc across the north Pacific from the Sea of Japan through the southern Bering Sea to the Channel Islands (i.e., San Miguel Island) off southern California. Except for the San Miguel breeding population, the animals migrate north in the spring to several Bering Sea and North Pacific breeding islands. Each year, most of these animals use several discrete shoreline locations on the Pribilofs for mating, pupping, and non-breeding landing sites. Together these sites are referred to as rookeries.

Important rookeries on St. Paul Island are found from Zapadni Point to Tolstoi Point (i.e., English Bay rookeries), along the shoreline of the peninsula south of the City of St. Paul (i.e., Reef Point rookery) and an offshore rock (i.e., Sea Lion Rock rookery), from the north side of Black Bluffs to north of Lukanin Point (i.e., Kitovi and Lukanin Rookeries), along the eastern shoreline near Polovina Point (i.e., Polovina Rookeries), and along both shorelines of the northernmost tip of the island (i.e., Northeast Point Rookeries). St. George Island also has several important Northern fur seal rookeries found along the north coast from First Bluffs to the City of St. George (i.e., Staraya Artil and North Rookeries), east of the city toward Tolstoi Point (i.e., East Rookeries), and along the southwest coast from the harbor directly south (i.e., Zapadni and South Rookeries). It should also be noted that non-breeding Northern fur seals also land at Otter and Walrus Islands. See [Environmental Sensitivity Index maps for rookery locations on St. Paul and St. George Islands](#).

Northern fur seals have relatively thin blubber layers and depend on fur for insulation. As with sea otters, oiled fur can result in the loss of insulation, making this species the most vulnerable to oiling of all the pinnipeds. Fur seals nibble their pelage with their teeth and can ingest oil while grooming. It is also possible that juvenile Northern fur seals can ingest oil while nursing.

The greatest risk to Northern fur seals from an oil spill is when they are on the breeding rookeries in the Pribilof Islands from May through November. At that time, approximately 80 percent of the world's Northern fur seal population breeds and pups on the Pribilof Islands. Except for the breeding period, the Northern fur seal remains at sea, feeding on mid-water fish and squid. During an oil spill, pups would be the most sensitive to the effects of oiling, while adults would be the most difficult to handle.

More detailed information on the characteristics of northern fur seals and potential oil spill impacts is found in *Wildlife Protection Guidelines: Pribilof Islands (Pribilof Guidelines)* on the ADEC [Aleutians Subarea Plan](#) web page.

Primary Response Strategies. Specific primary response strategy information for Northern fur seals in the Pribilof Islands is found in the *Pribilof Guidelines* on the ADEC [Aleutians Subarea Plan](#) web page.

Primary response strategies will be emphasized for this species, since both secondary and tertiary responses are generally not feasible during most of the period when the animals are present on rookeries or are hauled-out.

Secondary Response Strategies. No attempts should be made to drive breeding bulls, breeding females, or nursing pups during mid-May through mid-September. Territorial bulls cannot be driven during this time, and their belligerent behavior could result in great risk to individuals trying to drive them. In addition, disturbance of rookeries during this period can result in pup mortality due to pup abandonment and trampling.

Driving Northern fur seals away from an oiled beach would be feasible only for non-territorial, non-breeding juvenile males (i.e., 3-to-4 year old animals may be driven from one beach area to another or they may be driven from a low beach area to higher ground and held for a period of time); and all animals before the breeding season begins (i.e., before mid-May) or after the breeding season ends (i.e., after mid-September).

Pre-emptive capturing and relocation may be feasible, if only a small number of fur seals are in danger of being oiled. However, the potential for Northern fur seals to be oiled will need to be high before this technique is used.

Specific secondary response strategy information for Northern fur seals in the Pribilof Islands is found in the *Pribilof Guidelines* on the ADEC [Aleutians Subarea Plan](#) web page.

Tertiary Response Strategies. Capturing and cleaning oiled Northern fur seals is generally not feasible. The females spend part of the time nursing their young on the rookery and approximately one week at a time feeding at sea. This behavior increases their chance of contacting oil, particularly if it is near a rookery. Pups are most vulnerable to oiling when returning females transfer oil they have picked up to their young or when oil is washed onto rookery beaches. Since females nurse only their own pup, a cleaned pup would have to be returned to the rookery for its mother to find, which could expose the pup to re-oiling. Capturing and rehabilitating oiled pups is not recommended because of the danger to personnel from territorial bulls and problems associated with separating a pup from its mother. Furthermore, oiled adult Northern fur seals would be extremely dangerous to handle even if they were partially debilitated.

Specific tertiary response strategy information for Northern fur seals in the Pribilof Islands is found in the *Pribilof Guidelines* on the ADEC [Aleutians Subarea Plan](#) web page.

- Request authorization to conduct northern fur seal response activities (hazing/deterrence or pre-emptive capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting northern fur seal deterrence or pre-emptive capture are listed in Table 4-2.
- *Pribilof Guidelines* on the ADEC [Aleutians Subarea Plan](#) web page.
- Appendices for the *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where Northern fur seals are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.2.2 – Steller Sea Lions

The Steller sea lion is the largest member of the family Otariidae, which includes sea lions and fur seals. Steller sea lion distribution extends along the Pacific Rim with its center of abundance in the Aleutian Islands and Gulf of Alaska where, historically, nearly three-quarters of all Steller sea lions in U.S. territory were found. Steller sea lions haul-out on land to mate, bear their young, nurse, avoid predators and disturbance, and rest. Steller sea lions are generally considered non-migratory although some individuals, particularly juveniles and adult males, disperse widely outside the summer breeding season. Pupping occurs at discrete sites (rookeries) from mid-May through mid-July. Sites classified as haulouts

1 may be also used throughout the year. Molting periods normally extend from June through August,
2 during which time Steller sea lions can remain out of water for extended periods.

3 Under the ESA, the species is described by two DPSs; the western DPS (primarily west of 144°W
4 longitude) is listed as an endangered species. The western DPS has shown dramatic declines in the last
5 several decades. At many sites, the number of Steller sea lions has declined by more than 80 percent
6 since the mid- to late 1970s, and at some sites in the western Aleutians, sea lions have all but
7 disappeared. By contrast, the eastern DPS has been increasing in abundance at over 3 percent overall
8 for about 30 years, more than doubling in Southeast Alaska, British Columbia, and Oregon.

9 A spill (depending on many variables such as amount and type of product spilled) could affect the
10 health, survival, and/or the reproduction of affected Steller sea lions. Steller sea lions can also be
11 impacted by response activities, such as helicopter activity and/or vessel activity near rookeries or
12 haulouts. Steller sea lions are highly susceptible to disturbance when on haulouts and rookeries. The
13 marked sexual dimorphism in size within the species and the large size of adults, especially adult males,
14 are both features of Steller sea lion morphology that are important to consider when evaluating their
15 vulnerability to certain threats that can cause disturbance when the animals are hauled-out on land.
16 Smaller animals are vulnerable to injury or even death if trampled by adults, especially by large males.
17 The large size of Steller sea lion adults also makes the capture, handling, salvage, and thus the
18 monitoring and study of this species, more challenging than many other pinnipeds. A spill (again
19 depending of type and size) could have effects on any sea lions that inhale vapors from fresh oil,
20 especially if they are already in a weakened physiological state. Inhalation of high concentrations of
21 volatile components of crude oil can damage the mucous membranes of the body, including those of the
22 airways, can lead to lung congestion and, with high-enough concentrations, can cause hemorrhagic
23 bronchopneumonia and pulmonary edema. Ingestion of crude oil can lead to diarrhea, increase passage
24 time of food through the intestinal tract, and decrease the nutritional value of food. Skin irritation and
25 conjunctivitis could result from prolonged exposure to oil. Such conditions can increase an individual's
26 physiological stress and increase the likelihood of death of individuals that are highly contaminated or
27 already weakened.

28 Like Northern fur seals, Steller sea lions are easily disturbed when on haulouts and rookeries. However,
29 Steller sea lions are less susceptible to adverse effects of oil than are Northern fur seals. Unlike Northern
30 fur seals, adult Steller sea lions have a thick layer of fat, and do not rely on their fur for insulation. The
31 absence of grooming behavior in Steller sea lions lessens the chance of ingestion of oil. However, oil
32 could be ingested through oiled food, or by pups during nursing.

33 Within the Steller sea lion population, females and pups have the greatest risk of oiling. During the
34 pupping and breeding season, females spend part of their time on the rookery and part of their time
35 feeding at sea. Steller sea lion pups, which are generally weaned one to two years after birth, have less
36 subcutaneous fat than adults and are likely to be more sensitive to the effects of oiling. In addition, pups
37 can ingest oil from their mothers while nursing.

38 **Primary response strategies**, which prevent Steller sea lions and/or their habitat from becoming oiled,
39 should be emphasized. Because some sea lion haulouts and rookeries are seasonally occupied, it may be
40 possible to access all or portions of those areas to remove surface oil prior to the arrival of Steller sea
41 lions. However, since many of these sites may be occupied year-round, it will be important to coordinate
42 closely with NMFS to avoid or minimize effects from response activities. To avoid causing disturbance
43 related-injury or death, aircraft, especially helicopters, should avoid flying near Steller sea lion terrestrial
44 sites. Responders will need input from NMFS on whether removal efforts would be appropriate for
45 unoccupied sites, since many of those sites are exposed to significant wave action and may not retain

oil. Whenever Steller sea lions are present on a haulout or rookery, efforts to remove oil from the site are likely to harass the animals, leading to possible injury or death. In those cases, deflection booming (if possible) or other primary response strategies will be considered to prevent oil from reaching the site. Responders will need to work in close consultation with NMFS to ensure response actions do not unintentionally harass sea lions. It will likely be necessary to establish minimum approach distances for response personnel and equipment.

Secondary response strategies. Deterrence of Steller sea lions, in the water or on land, has mixed results. In-water acoustic deterrence has not proven to be more than temporarily effective, and can actually attract Steller sea lions. Likewise, the use of boats for deterrence is ineffective. Any attempt to deter Steller sea lions from a rookery or haulout can create panic or a stampede that may result in Steller sea lion injury or death, particularly to pups. It can also result in pup mortalities due to abandonment by their mothers. In addition, territorial Steller sea lions, particularly bulls, are large and dangerous animals that can pose a significant risk to personnel. It should also be noted that Steller sea lions, which are by nature inquisitive, may haul-out on floats, vessels, or other response-related equipment. In those cases, it may be necessary to deter the animal(s) in close consultation with NMFS.

Tertiary response strategies. Capturing and cleaning oiled adult Steller sea lions may not be feasible due to concerns for both the safety of the animals and the human handler. Unless the probability of survival for an oiled animal was considered very low, and the likelihood of successful rehabilitation was very high, tertiary response strategies will not be used. Capture and rehabilitation of adult sea lions could require administering anesthesia in the field, logistical challenges in collection and transport of the animal to a suitable facility (with attendant danger to response personnel), rehabilitation, and release. Pups and juveniles can be small enough to capture and rehabilitate.

- Request authorization to conduct Steller sea lion response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting Steller sea lion deterrence or pre-emptive capture are listed in Table 4-2.
- Appendices for the *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where Steller sea lions are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA. Because of their status under the ESA, any response-related activities for Steller sea lions will be addressed by the FOSC via ESA consultation with NMFS.

9740.2.2.3.2.3 – Ringed Seals

Arctic ringed seals are listed as threatened under the ESA (December 12, 2012; 77 FR 76706) due to projected loss of sea ice habitat. Ringed seals have a thick blubber layer for insulation, and little grooming behavior, which lessens the chance of ingesting oil. However, pre-weaned pups probably are much more sensitive to the effects of oiling because they rely primarily on lanugo (i.e., a thick layer of white hair) for insulation and have little or no blubber layer at birth. Therefore, oiling of lanugo could result in the loss of insulation, which could be fatal to pre-weaned pups. March to June is the critical period for pups, which are born in March and April and are weaned by June. By the time the pups are weaned, they have a well-developed blubber layer for insulation.

1 Ringed seals do not establish breeding rookeries, and males do not form harems. Rather, pups are born
2 and reared in subnivean (under snow) lairs constructed by their mothers. These lairs are scattered over
3 the shorefast ice and stable pack ice where sufficient snow has accumulated, minimizing the threat of a
4 single oil spill to large proportions of the ringed seal population. During the breeding season, breeding
5 adults are thought to dominate the shorefast ice zone; non-breeding sub-adults apparently dominate
6 the flow zone; and all ages of ringed seals occur in the pack ice.

7 The most immediate threat to ringed seals would be direct oil contamination of subnivean lairs and pre-
8 weaned pups, or indirect oil contamination resulting from the transport of oil into lairs by adults. The
9 extent of injury could be determined by locating and opening lairs. It is possible to locate ringed seal
10 lairs using specially trained dogs.

11 **Primary response strategies** are emphasized for ringed seals. During the most sensitive period (i.e., the
12 breeding period), the application of secondary and tertiary response techniques would be challenging.

13 **Secondary response strategies.** This response would be feasible only during periods when animals are
14 using ice floes for hauling out and conditions are not suitable for construction and occupation of lairs. It
15 probably is not possible to catch ringed seals on ice floes, and chasing them into the water would likely
16 result in negative, rather than positive, effects.

17 **Tertiary response strategies.** There are challenges to consider in attempting to capture and rehabilitate
18 oiled pre-weaned ringed seals. Pre-weaned pups may not be able to be returned to the wild. After
19 cleaning, pups returned to their subnivean lair so their mothers could provide nourishment might be re-
20 contaminated with oil, or their mothers may have abandoned the lair. Attempting to capture and
21 rehabilitate post-weaned ringed seal pups would be more feasible, however, if an animal, regardless of
22 age, moves into the water when approached, it could be exposed to oil.

23 It may not be possible to return treated ice seals, including ringed seals, back into the wild following
24 capture and treatment, due to subsistence and disease concerns.

25 Request authorization to conduct ringed seal response activities (hazing/deterrence, pre-emptive
26 capture and related activities, or oiled animal capture and related activities) in Startup or
27 Comprehensive WRPs ([Section 9740.3.7](#)).

- 28 • Permits required for conducting ringed seal response activities are listed in Table 4-2.
- 29 • Appendices for the NMFS *Arctic Marine Mammal Disaster Response Guidelines*, available on the
30 [NOAA Institutional Repository](#).

31 If primary, secondary, or tertiary response strategies are proposed in locations where ringed seals are or
32 may be present, the OSCs will need to immediately consult with NMFS regarding the proposed
33 strategies to ensure compliance with the MMPA. Because of their status under the ESA, any response-
34 related activities for ringed seals will be addressed by the FOSC via ESA consultation with NMFS.

35 9740.2.2.3.2.4 – Harbor Seals

36 Harbor seals have a thick blubber layer for insulation and little grooming behavior, which lessens the
37 chance of oil ingestion. However, pre-weaned pups are probably much more sensitive to the effects of
38 oiling because they rely primarily on a fur coat for insulation and also because oiling could result in a
39 pup's loss of insulation. Pups have little or no blubber layer at birth.

40 Harbor seals do not exhibit the bull harem territorial behavior characteristic of fur seals and sea lions.
41 Furthermore, pup production does not appear to be restricted to a few major rookeries, as is the case
42 for sea lions.

Hauled-out harbor seals are easily disturbed. Adults and pups haul-out on tidal rocks and lower portions of beaches near the water's edge, thus making them particularly likely to contact oil that comes ashore after a spill. Adult females readily enter the water when disturbed, leaving pups on the shore. Oil cleanup crews should not pick up what appear to be abandoned pups because females probably will return; however, prolonged cleanup in harbor seal rookeries can result in permanent pup abandonment by females. Pups that appear to be in distress or without their mother should be reported to the WB and EU to ensure monitoring and response.

Primary response strategies, which prevent harbor seals from becoming oiled, should be emphasized.

Secondary response strategies. This response is feasible for swimming harbor seals and known harbor seal haulout and rookery beach areas. Response activities may attract curious harbor seals; in areas of oiled beaches frequented by hauled out harbor seals, it may be feasible to use noisemaking devices (such as propane cannons) to deter seals for a short amount of time. Deterring with predator or companion sounds may be effective. Any deterrence strategies will need to be monitored for effectiveness.

Tertiary response strategies. Attempting to capture and clean harbor seals may be possible. If a harbor seal is ill and does not try to escape when approached, it is likely feasible to capture the animal and attempt to treat it. Only if it is determined that the probable survival of the oiled marine mammal is very low and the likelihood of successful rehabilitation is high, should tertiary response strategies be considered.

- Request authorization to conduct harbor seal response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting harbor seal response activities are listed in Table 4-2.
- Appendices for the *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Appendices*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where harbor seals are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.2.5 – Spotted Seals

Spotted seals have a thick blubber layer for insulation and little grooming behavior, which lessens the chance of oil ingestion. Pre-weaned pups are probably the most sensitive to the effects of oiling because they rely primarily on hair for insulation and have little blubber and also because oiled hair could result in the loss of a pup's insulation. The most critical period for this species is when pupping begins in late March and until weaning ends in June.

Spotted seals are similar in appearance and behavior to harbor seals, hauling out on ice floes in the spring and early summer and coastal beaches during ice free months. Response techniques that apply to ringed and harbor seals also should apply to hauled-out spotted seals.

From late fall through spring, spotted seal habitat use is closely associated with sea ice. Spotted seals use sea ice starting with its formation in the fall, and often concentrate in large numbers on the early ice that forms near river mouths and estuaries. In winter, as the ice thickens and becomes shorefast along the coasts, spotted seals move seaward to areas near the ice front with broken floes. As spring approaches in the Bering Sea, spotted seals mainly inhabit the southern margin of the sea ice, where

beginning in late March, sea ice floes are used for pupping, nursing, and weaning. Male female, male female pup, and female pup groups usually are distributed over ice floes. While non-breeding animals usually are clumped into large groups, these groups of spotted seals typically are spread over relatively large areas.

Primary response strategies will be emphasized for spotted seals.

Secondary response strategies. During ice free periods, spotted seals move into coastal haulout areas. In areas of oiled beaches frequented by hauled-out spotted seals, it may be feasible to use noisemaking devices (such as propane cannons) to deter animals for a short amount of time. Using deterrence during ice seasons may or may not be feasible depending on logistical access to the ice front. Detering with predator or companion sounds may be effective. Any deterrence strategies will need to be monitored for effectiveness.

Tertiary response strategies. Attempting to capture and rehabilitate spotted seals may be feasible. If an animal, regardless of its age, takes to the water when approached, it should be left alone. If the spotted seal is ill and does not try to escape when approached, it may be feasible to pick up the animal and attempt to treat it.

It may not be possible to return treated ice seals, including spotted seals, back into the wild following capture and treatment, due to subsistence and disease concerns.

- Request authorization to conduct spotted seal response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting spotted seal response activities are listed in Table 4-2.
- Appendices for the NMFS *Arctic Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where spotted seals are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.2.6 – Bearded Seals

The Beringia DPS of bearded seals, which includes Alaska, is listed as threatened under the ESA (December 28, 2012; 77 FR 76740) due to projected loss of sea ice habitat. Bearded seals have thick blubber layers for insulation and little grooming behavior, which lessens their chance of ingesting oil. Pre-weaned pups are probably much more sensitive to the effects of oiling because they rely primarily on hair for insulation and have little blubber and also because oiled hair could result in the loss of a pup's insulation.

Unlike most of Alaska's pinnipeds, bearded seals are benthic foragers. Thus, their distribution is limited to shallow areas, where water depth does not exceed approximately 200 meters. Bearded seals are closely associated with sea ice; and their seasonal movements are generally related to sea ice advance and retreat. Bearded seals typically avoid areas of continuous, thick, shorefast ice. During winter and spring, bearded seals in Alaska are widely distributed in the broken, drifting pack ice ranging from the Chukchi Sea south to the ice front in the Bering Sea. As the ice retreats in mid-April through June, most adults are thought to move into the Chukchi and Beaufort seas where they spend the summer and early fall near the wide, fragmented margin of multiyear ice. A small number of mostly immature individuals remain near the coasts, and can be found in bays, river mouths, and traveling up some rivers.

Most bearded seal pups are born on ice floes in the Bering Sea from mid-March through early May, with peak pupping occurring in the Bering Strait and northward during the last one third of April and southward typically earlier in April. Wintering and pupping bearded seals are also known to occupy coastal leads in the Bering and Chukchi seas, and low densities of pupping females also occupy intermittent shore leads deep into the winter pack ice of these seas.

Bearded seal pups are most vulnerable to the effects of oiling from mid-March through June. Research suggests an extended lactation period of about 24 days. Among Arctic phocid seals, bearded seal newborns are relatively large and grow comparatively quickly.

Primary response strategies will be emphasized for bearded seals.

Secondary response strategies. The use of deterrence may or may not be feasible depending on logistical access to the ice front. Deterring with predator or companion sounds may be effective. Any deterrence strategies will need to be monitored for effectiveness.

Tertiary response strategies. The bearded seal is the largest phocid seal in Alaska. Capture and treatment of adults may be difficult due to safety concerns for both the animals and the human handlers. In some situations, capture and cleaning may be possible; however, if an animal, regardless of age, moves into the water when approached, it should be left alone. If the bearded seal is ill and does not try to escape when approached, it would be feasible to pick up the animal and attempt to treat it.

It may not be possible to return treated ice seals, including bearded seals, back into the wild following capture and treatment, due to subsistence and disease concerns.

- Request authorization to conduct bearded seal response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting bearded seal response activities are listed in Table 4-2.
- Appendices for the NMFS *Arctic Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where bearded seals are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.2.7 – Ribbon Seals

Ribbon seals are a pelagic species, have a thick blubber layer for insulation and little grooming behavior, which lessens the chance of oil ingestion. Pre-weaned pups probably are much more sensitive to the effects of oiling because they rely primarily on hair for insulation and have little blubber, and also because oiled hair could result in the loss of a pup's insulation.

Ribbon seals are associated with the Bering Sea ice front during the winter and spring. It has been observed that ribbon seals tend to be most abundant in the northern part of the ice front. As the ice melts in the spring, ribbons seals become more concentrated with at least part of the Bering Sea population moving towards the Bering Sea Strait and the southern part of the Chukchi Sea. Unlike bearded seals, individual ribbon seals do not appear to follow the ice front as it retreats northward during the summer; they instead remain widely distributed offshore during the summer in the Bering, Chukchi, and Beaufort seas.

Ribbon seals do not haul out on land; rather they use ice floes for haulout and pupping areas. However, due to the scattered distribution of ribbon seals, an oil spill threat to a large proportion of the population is rather remote. The period before pups are weaned, when ribbon seals are most vulnerable, is late March through early June. The period between birth and weaning is approximately three to six weeks.

Primary response strategies will be emphasized for ribbon seals.

Secondary response strategies. The use of deterrence may or may not be feasible depending upon logistical access to ice fronts. Deterring with predator or companion sounds may be effective. Any deterrence strategies will need to be monitored for effectiveness.

Tertiary response strategies. If they can be reached, capturing and cleaning ribbon seals may be feasible. If an animal, regardless of age, takes to the water when approached, it should be left alone. If a ribbon seal pup is ill and does not try to escape when approached, it may be feasible to pick up the animal and attempt to treat it.

It may not be possible to return treated ice seals, including ribbon seals, back into the wild following capture and treatment, due to subsistence and disease concerns.

- Request authorization to conduct ribbon seal response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting ribbon seal response activities are listed in Table 4-2.
- Appendices for the NMFS Arctic Marine Mammal Disaster Response Guidelines, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where ribbon seals are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.2.5 – Pacific Walruses

Walruses are nearly circumpolar with the Pacific walrus inhabiting the shelf waters of the Bering and Chukchi seas and extending into the eastern East Siberian and western Beaufort Seas. Alaska's population of Pacific walruses has increased steadily from the 1950s through the 1970s to near historic population levels.

In January, February and March, Pacific walruses are usually found southwest of St. Lawrence Island and in outer Bristol Bay. From late March until December/January, walruses move north, then south, following ice reduction and growth. Walruses are very gregarious and occur as small groups at sea or haul-out in groups up to several thousand. Like fur seals and sea lions, Pacific walruses are extremely susceptible to disturbance at haul-out areas. Stampeding can result in the injury or death by trampling of the pups and, to a lesser extent, juveniles and adults.

Since the record loss of sea ice in the Chukchi Sea in September 2007, walruses have been hauling out in large numbers in Alaska along the coast. Haul-outs were reported from several areas in 2007 with estimates of several hundred to thousands of animals depending on the location. In 2008, enough remnant ice persisted through the summer and fall that large haul-outs did not occur in Alaska. However, in 2009, a haul-out of about 3,000 animals formed at Icy Cape. Moreover, a haul-out formed just north of the village of Point Lay on the barrier island in 2007, 2009, 2010, and 2011. This haul-out numbered from a few hundred to a few thousand walruses in 2007 and 2009, peaking at more than

30,000 walrus in 2010, and decreasing to an estimated 20,000 animals in 2011. (Note that estimates are from aerial overflights, rather than from formal counts.) Haul-outs have formed earlier each year and persist for about four to six weeks. Walrus movement studies by the U.S. Geological Survey indicate that the animals along the Alaska coast eventually make their way to the Russian coast and then move south with the advancing sea ice in the fall.

These animals have thick skin and blubber layers for insulation and no grooming behavior, which lessens their chance of ingesting oil. However, nursing pups will be at risk due to ingestion of oil from contaminated teats. Adult walrus' thermoregulation abilities are probably not affected by direct contact with oil, since heat loss is regulated by control of peripheral blood flow through the animal's skin and blubber. There is evidence that short-term oil-induced irritation to the eyes (i.e., conjunctivitis) is reversible.

There can be long-term chronic effects because of exposure during migration through oil-contaminated waters or hauling out onto oil-contaminated land and ice, and there may be the possibility of consuming contaminated prey items. Adult walrus may not be severely affected by the oil spill through direct contact; however, they are extremely sensitive to any habitat disturbance by response activities.

Primary response strategies will be emphasized for Pacific walrus.

Secondary response strategies. Herding animals away from an oil spill site using boats may be feasible for Pacific walrus already in the water, although it will not be authorized unless done by someone very familiar with walrus behavior, who can judge the effectiveness of the technique in real time. Hauled-out animals should be left alone due to the risk of trampling if stampeding occurs.

There are no data indicating that visual deterrence methods are effective for keeping walrus away from a specific site. The use of propane cannons and other firearms may be effective for short-term deterrence of walrus that are already in the water; however, this method will not be used in the vicinity of haul-out sites.

Tertiary response strategies. Attempting to capture and rehabilitate Pacific walrus generally is not feasible because of their sensitivity to disturbance and the potential danger to personnel posed by the walrus' large size and belligerent behavior. However, young oiled walrus may be feasible to capture, clean, rehabilitate, and release. Because of walrus' relative insensitivity to oil, any benefit should be weighed against the risks to humans and other walrus, especially at haul-out sites, of this response activity.

- Request authorization to conduct Pacific walrus response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting Pacific walrus response activities are listed in Table 4-2.
- Procedures and protocols for Pacific walrus response activities would be created in conjunction with USFWS Marine Mammals Management Office, and may be similar to those outlined for other pinnipeds in NMFS *Arctic Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where Pacific walrus are or may be present, the OSCs will need to immediately consult with USFWS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.3 – Cetaceans (Baleen and Toothed Whales)

Research on the susceptibility and sensitivity of small, warm water cetaceans to oil indicates that if directly exposed to oil for short periods of time, transient effects to the skin will occur. In addition, short term effects on feeding by baleen whales may occur but would be reversed within a few days after the whales moved into clean waters. Furthermore, bioaccumulation of petroleum hydrocarbons may occur, but its long-term effects are unknown.

The above considerations would apply in areas of open ocean where exposure would be relatively short term. However, oil trapped within an ice lead could lead to an increased duration of exposure and associated effects for whales (such as bowheads or belugas) that use the ice lead as a migration pathway.

9740.2.2.3.3.1 – Response Strategies

Primary and secondary response strategies are generally the only feasible response strategies for this group of marine mammals. Some species, particularly large whales (such as bowheads), could possibly be steered away from a spill site. Other species, such as Dall's porpoise, are attracted to ship traffic and human activity and might be attracted to a spill.

If primary response strategies are proposed in locations where cetaceans are (or may be) present, the FOSC will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA and ESA.

9740.2.2.3.3.2 – Cetacean Response Forms and Tools

- Request authorization to conduct cetacean response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting cetacean response activities are listed in Table 4-2.
- Deterrence techniques have been developed for killer whales in Washington State and may be appropriate for killer whales or other cetacean species in Alaska:
 - *Supporting Information for the Killer Whale section of the Northwest Wildlife Response Plan*, Chapter 9970 of the *Northwest Area Contingency Plan*, available on the NOAA Office of Response and Restoration [Oil Spill Response and Killer Whales](#) web page.
- Norris, Kenneth S., and Roger L. Gentry. 1974. Capture and Harnessing of Young California Gray Whales, *Eschrichtius robustus*. *Marine Fisheries Review* 36(4):58-64.
- Mate, Bruce R. and James T. Harvey, eds. 1987. *Acoustical Deterrence in Marine Mammal Conflicts with Fisheries*. Proceedings of a February 17 18, 1986, Workshop in Newport, Oregon. Oregon State University Sea Grant College Program, Corvallis, Oregon.
- Appendices for the NMFS *Arctic Marine Mammal Disaster Response Guidelines* and *Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed in locations where killer whales are or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA.

9740.2.2.3.4 – Polar Bears

Two populations of polar bears (*Ursus maritimus*) occur in Alaska: (1) the Southern Beaufort Sea population which is shared with Canada, and (2) the Chukchi/Bering seas population, which is shared with Russia. Based on recently conducted mark/recapture studies from 2001-2006, the Southern Beaufort Sea population has approximately 1,500 bears and is currently thought to be declining. Although accurate estimates of the Chukchi/Bering seas population are unavailable, the best available information suggests that there may be about 2,000 bears and that the population is declining. In 2008, the polar bear was listed as a threatened species under the ESA. The polar bear is also protected under the MMPA.

Polar bears are migratory in that they move in association with the arctic ice pack. Polar bears tend to occur in low densities over large areas and generally do not concentrate, except in areas of exceptional food resources, such as whale carcasses, or whale butchering sites at villages (e.g., at Kaktovik). They tend to be solitary animals or family groups following the annual variations in seal distributions, which are associated with fluctuations in the ice conditions and water depth. Polar bears' preferred prey are ringed seals (*Phoca hispida*), whose populations may be more at risk to oil contamination than polar bears. Polar bears along the North Slope of Alaska will tend to gather in areas where ringed seal pups occur during the spring.

There is no single critical period for polar bears, although bears are most sensitive to disturbance during denning. Denning is initiated by late November with family groups emerging during late March and early April. Recent studies in the Beaufort Sea indicate that greater than 80 percent of the dens in this area are located on sea ice, primarily thick multiyear ice plates. Denning locations for the western stock are not as well documented, although a high density of dens is known to be located on Wrangell Island in Russia.

Polar bears are most sensitive to disturbance from oil spill clean-up activities and oiling of female bears prior to denning (October-April). In addition, weather conditions and care of young during winter months create great energy demands on polar bears which could lead to a highly stressed physiological state, if they coincide with an oil spill. Cleanup operations that disturb a den could result in death of cubs through abandonment, and perhaps death of the sow as well. In spring, females with cubs of the year that denned near or on land and migrate to offshore areas may encounter oil. Other family groups with yearlings or two-year-old cubs and other sex or age classes may also be exposed if feeding or traveling near shore.

Oil spills occurring in areas where polar bears are concentrated, such as feeding areas, can correspondingly affect a greater proportion of the population. Areas of open water, such as leads or polynyas, and areas where beachcast marine mammal carcasses occur may concentrate polar bears. An oil spill in an area where polar bears are concentrated could have negative population effects.

Polar bears rely on blubber, guard hair, and a dense under fur for insulation. Once the animal's fur is contaminated with oil, vigorous and continuous grooming occurs, which can result in renal failure and dysfunction of red blood cell production. While large quantities of oil may be tolerated by polar bears if the oil is rapidly excreted from the gastrointestinal tract, only a few milliliters of aspirated oil are fatal.

9740.2.2.3.3.1 – Response Strategies

USFWS will be the lead agency for all polar bear response activities; ADF&G will assist on a case-by-case basis. Additional information on spill response for polar bears can be found in the *USFWS Oil Spill*

1 *Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web
2 page.

3 **Primary Response.** Primary response strategies will be emphasized for polar bears. The goal is to
4 prevent the oil from reaching sensitive areas such as denning sites, feeding sites, or areas where polar
5 bears are concentrated. Cleanup methods that disturb a den would probably result in the death of a
6 cub, and perhaps the sow. Areas where dens are located should always be avoided by all personnel.

7 Oiled carcasses and other debris from open water or the shoreline will need to be collected regularly.
8 Debris removal will minimize the potential for oiling of polar bears through scavenging or contact with
9 contaminated flotsam. To prevent oil from getting into the food chain, all polar bear carcasses will need
10 to be retrieved and delivered to collection or morgue sites in accordance with an incident-specific
11 carcass collection plan (Sections [3640.2](#) and [9740.3.2](#)).

12 **Secondary Response.** Secondary response strategies focus on deterring polar bears from areas
13 contaminated by an oil spill. This response is appropriate under all circumstances and can be
14 incorporated with primary response strategies. The degree of risk associated with the animal contacting
15 oil before secondary response strategies are initiated need to be considered. If the spill occurs when
16 polar bears are believed to be present, an aerial survey should be conducted to locate potentially
17 affected animals.

18 A deterrent is any method or device used to keep bears away from a particular location. To be effective,
19 the best deterrence requires early detection. Detection methods, which may be used in conjunction
20 with deterrents, can include bear monitors, trained dogs, trip wires, and motion sensors. If polar bears
21 are detected near a spill area or response operation, all personnel in the area will need to move to a
22 designated safe location. Procedures for retreating and designated safe places will need to be
23 established as soon as the response operation is initiated.

24 There are no data indicating that visual or olfactory deterrent methods are effective in keeping polar
25 bears away from specific sites. Artificial light, such as the electric lighting system at industry sites, may
26 deter some bears at night but may not be effective in fog or white out conditions and should not be
27 relied on solely as a deterrence. Auditory and physical stimuli, especially in combination, have been
28 successfully used to deter bears, although bears may acclimate to auditory deterrence alone. Herding or
29 hazing (dispersal of) polar bears with vehicles, boats, and aircraft has been successfully demonstrated.
30 These methods may be effective when oil is confined to a small area and can be regularly patrolled.

31 Pre-emptive capture should only be initiated if all other methods under the secondary response strategy
32 are ineffective in deterring bears from a spill site, and is only feasible if small numbers of animals are in
33 danger of being oiled and suitable relocation sites are nearby. The potential for polar bears to be oiled
34 will need to be high before this technique is initiated. Human safety, as with all spill response
35 operations, is the top priority during all polar bear response activities.

36 **Tertiary Response.** Tertiary response strategies include capturing, handling, transporting, rehabilitating,
37 holding, and releasing polar bears. While this response may be feasible on a small scale, little is known
38 about the potential effects of capturing oiled polar bears. However, rehabilitation of individual animals
39 may be considered on a case-by-case basis, with pregnant females and sows with cubs given priority.
40 Careful consideration should be made of the added handling stress and the potential for spreading
41 diseases.

9740.2.2.3.3.2 – Polar Bear Response Forms and Tools

- Request authorization to conduct Polar bear response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting Polar bear response activities are listed in Table 4-2.
- Procedures and protocols for Polar bear response activities are in in the *USFWS Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page.

If primary, secondary, or tertiary response strategies are proposed in locations where Polar bears are or may be present, the OSCs will need to immediately consult with USFWS regarding the proposed strategies to ensure compliance with the ESA and MMPA.

1 9740.2.3 – *Terrestrial Mammals*

2 9740.2.3.1 – Terrestrial Mammal Protection Priorities

3 Terrestrial mammal species may be prioritized in the planning area based on whether:

- 4 1. The species, or species group, is known to be particularly vulnerable to impacts from an oil spill.
- 5 2. The population of the species in the planning area represents a significant proportion of the
- 6 species' total world population.
- 7 3. The species has been given a special status by state or federal agencies.
- 8 4. The species is an important subsistence resource.

9 Table 9-5 shows priority species by geographic area.

Table 9-5: Status¹ of Terrestrial Mammal Species of Concern by Geographic Zone in Alaska. Criteria for inclusion are: The population of the species in the planning area represents a significant proportion of the species' total world population; the species, or species group, is known to be particularly vulnerable to impacts from an oil spill; the species has been given a special status by state or federal agencies; or the species is an important subsistence resource.

Species	Southeast	Prince William Sound	Cook Inlet	Kodiak	Aleutians	Bristol Bay	Western Alaska	Northwest Arctic	North Slope	Interior
Brown Bear	P / S	P / S	P / S	P	P / S	P / S	P / S	P / S	P / S	P / S
Black Bear	P / S	P / S	P / S	--	--	P / S	P / S	P / S	P / S	P / S
Caribou/Reindeer	--	P / S	P / S	P	P / S	P / S	P / S	P / S	P / S	P / S
Moose	P	P / S	P / S	--	--	P / S	P / S	P / S	P / S	P / S
Muskoxen	--	--	--	--	--	--	P / S	P / S	P / S	--
Bison	--	P	--	--	--	--	P	--	--	--
Mountain Goat	P / S	P / S	P / S	P	--	--	--	--	--	--
Dall Sheep	--	P / S	P / S	--	--	P / S	P / S	P / S	P / S	P / S
Sitka Black-tailed Deer	P / S	P / S	P / S	P / S	--	--	--	--	--	--
Wolf	P	P / S	P / S	P	P / S	P / S	P / S	P / S	P / S	P / S
Arctic Fox	--	--	--	--	P / S	P / S	P / S	P / S	P / S	--
Red Fox	P	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S
Aquatic Furbearers (e.g., beavers, muskrats, and river otters)	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S	P / S

¹ P = Present; S = Subsistence Species

9740.2.3.2 – Terrestrial Mammal Response Strategies

Little research has been done on the effects of oil on terrestrial mammals or on their susceptibility to oiling in the wild. However, it is possible to extrapolate potential oil spill impacts based on existing studies and observations of the behavior, food preferences, and habitat requirements of individual species.

Given that marine oil spills are statistically the most likely source of wildlife contamination, terrestrial species that spend a great deal of time feeding or traveling in intertidal areas and shorelines are at the greatest risk of being oiled. Bears, foxes, wolves, marten, and wolverines commonly scavenge for carcasses in intertidal areas. Mink and river otters also frequent coastal habitats. While ungulates tend to spend a smaller percentage of their time in coastal areas, certain deer and caribou are seasonally consistent users. Intertidal areas are used throughout the year, especially during winter and early spring since beaches often provide the easiest routes for travel as well as food when other sources are scarce.

Inland oil spills into water (e.g., along the Trans-Alaska Pipeline) may affect wildlife using rivers, streams, and wetlands. In addition to the species mentioned above, beavers, muskrats, and moose spend considerable time in or around inland waters. Muskoxen, bison, Dall sheep and mountain goats are also present in the Trans-Alaska Pipeline corridor and could be affected by terrestrial spills or cleanup activities.

Oil-related mortalities generally occur due to internal injury resulting from ingestion of oil, dermal absorption of oil, or because of hypothermia caused by oiling and matting of fur. Animals spending a great deal of time in the water will frequently groom to maintain insulating properties of their fur and therefore can be expected to encounter problems due to both ingestion and hypothermia. Experience with oiled sea otters supports this. Injuries associated with ingestion of oiled food will probably be the primary impact to scavenging bears, foxes, wolves, marten, and wolverines, which feed in intertidal areas but do not commonly swim in the water.

Young animals may have lower tolerances to the toxic effects of oil. In addition to coming into direct contact with oil, young animals still being fed by parents could potentially be contaminated by parents bringing oil back to the nest or den on their fur or on food. Parents can also expose nursing young to petroleum hydrocarbons passed on in their milk.

The ADF&G will be the lead agency for all terrestrial mammal response activities on state and private lands. On federally managed lands, ADF&G will be the co-lead with the federal land manager.

If primary, secondary, or tertiary response strategies are proposed in locations where terrestrial mammals are or may be present, response personnel must consult with ADF&G regarding the proposed strategies to ensure compliance with state laws and permit requirements.

9740.2.3.2.1 – Primary Response

Primary response strategies emphasize keeping oil away from wildlife by controlling the source and spread of spilled oil. Primary response strategies can include mechanical cleanup, protective booming, in situ burning, and dispersant use. In many cases of oil spilled into water, shoreline protection may be the only viable response strategy.

Removal of oiled carcasses from beaches minimizes opportunistic feeding by scavengers. Similarly, removal of oiled kelp from intertidal areas, especially during the winter and spring, would eliminate a source of oil contamination for foraging Sitka black-tailed deer. However, removal of live seaweed from intertidal zones should be undertaken only after careful consideration of potential negative impacts on

the intertidal community. If a decision is made to remove live oiled kelp, only the upper portion of the oiled leaves should be removed. The stipe and basal portion of kelp leaves should be left to regenerate.

9740.2.3.2.2 – Secondary Response

Secondary response strategies involve keeping animals away from oiled areas. These strategies will be evaluated on a case-by-case basis, since they are likely to be labor intensive, stressful, dangerous to the animals (and potentially humans), and may only be effective for a short time.

Techniques for deterring birds may be applicable to terrestrial mammals in some cases. This could include the use of visual and auditory deterrence such as aircraft and ground vehicles. Various species will respond and habituate differently.

9740.2.3.2.3 – Tertiary Response

Tertiary response strategies involve capturing, handling, transporting, stabilizing, rehabilitating, and releasing oiled animals. This option is often not recommended as a viable response strategy for terrestrial mammals. The effects of drugging or physically restraining animals and handling-induced stress can actually increase mortalities. Another important consideration is the disease transmission potential among closely housed, stressed animals and back into wild populations if animals are released. Therefore, severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols (Sections [3640.2](#) and [9740.3.2](#)). In some cases, however, rehabilitation of individual animals can be considered for humane reasons, including orphaned young, or aquatic furbearers for whom experience with sea otters may be applicable.

9740.2.3.3 – Terrestrial Mammal Information by Species

The wildlife descriptions in the remainder of this appendix focus on terrestrial mammals that frequent coastal or inland aquatic habitats, including ungulates (caribou, muskoxen, moose, Sitka black-tailed deer, Dall sheep, bison, and mountain goats), brown and black bears, wolves, and furbearers (red foxes, Arctic foxes, river otters, mink, muskrats, beavers, wolverine, and marten).

9740.2.3.3.1 – Ungulates

Ungulates - caribou, muskoxen, moose, Sitka black-tailed deer, bison, mountain goats, and Dall sheep – are less frequently seen in intertidal and nearshore habitats compared to bears, wolves, and furbearers. However, Sitka black-tailed deer frequently forage on the beach during the winter and spring and will occasionally swim short distances. Arctic and Alaska Peninsula caribou also frequent coastal areas during the summer for insect relief. Muskoxen occasionally feed in coastal areas. All ungulates could be impacted by inland spills and response strategies along the Trans-Alaska Pipeline, especially if the oil spill enters rivers and streams.

Deer, moose, and caribou could potentially swim or wade through oil and subsequently ingest oil by licking it off their fur. All ungulates are subject to ingesting contaminated vegetation. Ingestion of oil would probably be more harmful than external oiling alone since hypothermia resulting from oiled fur is unlikely to occur. Potential internal injuries include those to the liver, kidneys, lungs, tissues around the eyes and nose, and the lining of the digestive tract. Internal injuries would be difficult to impossible to treat effectively. Response activities may also disturb ungulates, causing displacement from important habitats or into oiled areas.

9740.2.3.3.1.1 – Response Strategies

Primary Response strategies should emphasize keeping spilled oil away from ungulate habitat.

Secondary Response strategies will be developed on a case-by-case basis, since they are likely to be labor intensive, stressful, dangerous to the animals and humans, and may only be effective for a short time.

Tertiary Response strategies, including capturing and rehabilitating ungulates, are not recommended. Rehabilitation of individual animals (especially orphaned calves) can be considered for humane reasons on a case-by-case basis. Careful consideration should be made of the added handling stress and the potential for disease spread.

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

If primary, secondary, or tertiary response strategies are proposed in locations where ungulates are or may be present, response personnel must consult with ADF&G regarding the proposed strategies to ensure compliance with state laws and permit requirements.

9740.2.3.3.1.2 – Ungulate Response Forms and Tools

- Request authorization to conduct ungulate response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting response activities are listed in Table 4-2.
- Carcass collection information (Sections [3640.2](#) and [9740.3.2](#)).

9740.2.3.3.1.3 – Species Information

Several caribou herds are found throughout Alaska. All four Alaskan Arctic herds (Western Arctic, Teshekpuk Lake, Central Arctic, and Porcupine), the North and South Alaska Peninsula herds, and caribou on Unimak and Adak islands could potentially encounter oil in coastal areas. On the Arctic Slope and Alaska Peninsula, during the post-calving/insect relief season (mid-June to early August), thousands of caribou may be distributed along the coast, especially on river deltas, points, and other promontories to seek relief from mosquitoes and flies. Arctic caribou also commonly wade or swim to barrier islands for the same reason.

Herds that could potentially encounter oil spilled in the Trans-Alaska Pipeline corridor include the Western and Central Arctic herds, and the Ray Mountains and Nelchina herds. The Kenai Lowlands herd could also potentially encounter inland spills resulting from Kenai area industrial operations or the Swanson River field.

Ingestion of oil can result from animals licking oil off their fur or eating oiled food. However, laboratory evidence indicates that reindeer will eat foods contaminated with oil, especially if the food is of a preferred type, such as lichen. Caribou are also potentially subject to disturbance from oil spill response and cleanup operations.

Caribou seeking insect relief commonly aggregate in large groups on the windward side of deltas and promontories, which is also where oil can accumulate. During periods of insect harassment, caribou responses to hazing or herding are likely to be unpredictable. Pregnant cows moving to calving areas may be difficult to deter.

Muskoxen occur most commonly around Cape Thompson, in and west of the Arctic NWR, and on Nunivak Island. Small herds are also present in the Sagavanirktok River corridor on a year-round basis. These animals can be affected by an oil spill from the Trans-Alaska Pipeline.

Individual or small numbers of muskoxen may occasionally frequent coastal areas, especially river deltas, apparently to feed on salt-rich coastal terrestrial plants. Storms could potentially bring oil into these areas where it could contaminate vegetation and then be ingested.

Moose are present throughout most of Alaska, except for Kodiak Island, the Aleutian Islands, and islands in Southeast Alaska. Moose are generally found in inland habitats and do not often venture into intertidal areas. They prefer marshy areas, streams, and lakes and are commonly concentrated along river corridors on a year-round basis.

While moose are found all along the Trans-Alaska Pipeline corridor (except at the higher elevations in the Brooks, Alaska, and Chugach Ranges) they are most abundant between Pump Stations 7 and 12. As a result, moose are susceptible to ingesting aquatic vegetation contaminated by inland spills from the Trans-Alaska Pipeline. Since moose also enter fresh water to seek relief from insects during the summer, they could become externally oiled by contaminated water.

At the end of severe winters, many moose may be starving. When moose are in a weakened state, every effort should be made to avoid forcing them to move because of cleanup and response activities.

Sitka black-tailed deer are present on the Kodiak Archipelago, throughout Prince William Sound, and in Southeast Alaska. They tend to be found closer to the shoreline during the winter and early spring and to follow the receding snow line to higher elevations in the summer.

Sitka black-tailed deer are susceptible to oil ingestion and external oiling. They often forage for kelp and beach grasses in intertidal areas during the winter and spring when other food sources are scarce. This behavior probably poses the greatest risk of mortality, especially since deer are often in poor physical condition at that time of the year. Deer have also been observed to swim short distances and could become externally oiled, if there is oil in the water.

Response strategies should emphasize keeping spilled oil away from deer habitat. Removal of oiled kelp from beaches should be considered during winter and spring months. However, care should be taken to determine whether the removal of live kelp will result in a net ecological benefit. If kelp is removed, only the upper portion of the oiled leaves should be removed. The stipe and basal portion of kelp leaves should be left to regenerate.

While several herds of bison are found throughout the state, only the Delta herd is likely to encounter spilled oil since it is present year-round in the Trans-Alaska Pipeline corridor between Big Delta and Pump Station 10. Bison are migratory and generally graze on grasses and forbs.

Mountain goats are found throughout Southeast Alaska and in rugged terrain of the Chugach, Wrangell, and Alaska Ranges. They are, however, most likely to encounter oil spills along the Trans-Alaska Pipeline corridor where it passes through the Chugach Mountains.

Disturbance created by spill cleanup operations would probably be of more concern than any actual contact with oil. Mountain goats are particularly subject to disturbance when kids are born (late May to early June) and during breeding season (November and December). Kids are especially vulnerable to injury when panicked in rough terrain.

Dall sheep occur in many of the mountainous areas above 2,500 feet along the Trans-Alaska Pipeline corridor. In particular, they are found from Slope Mountain through the upper Dietrich River in the Brooks Range; near Black Rapids, south of Delta, in the Alaska Range; and in the area around Pump

Station 12 in the Chugach Range. They prefer ridges, steep slopes, and alpine meadows and are rarely found below the treeline. Sheep also gather at mineral licks which occur near the pipeline at Slope, Table, and Snowden Mountains and Snowden Creek.

Dall sheep could potentially be oiled by an oil spill originating from the Trans-Alaska Pipeline, although the disturbance created by spill cleanup operations would probably be of more concern than any actual contact with oil. Dall sheep are particularly subject to disturbance during lambing season (late May to early June) and breeding season (late November to early December). Lambs are especially vulnerable to injury when panicked in rough terrain.

9740.2.3.3.2 – Brown and Black Bears

While "brown" and "grizzly" bears are classified as the same species, in popular usage, "brown bear" refers to those individuals living along the coast, while "grizzly bear" refers to individuals living in interior areas. "Brown bear" will be used here to refer to both coastal and inland populations.

Brown and black bears can be found in coastal and inland areas throughout most of the state. Brown bears are present in many riparian corridors, such as the Sagavanirktok Valley, and are therefore subject to encountering oil spilled from the Trans-Alaska Pipeline into those areas. Brown bears are not found on islands south of Frederick Sound in Southeast Alaska, the Aleutian Islands west of Unimak Island, and are rare on the Yukon-Kuskokwim Delta. While black bears are distributed throughout most of the forested areas of the state, they are not generally found in areas covered by tundra or muskeg (e.g., in areas north of the Brooks Range or on the Seward Peninsula). Moreover, black bears do not occur on Kodiak, Montague, or Hinchinbrook Islands or on the Alaska Peninsula beyond Lake Iliamna. Black bears are present in Southeast Alaska, except on Admiralty, Baranof, Chichagof, and Kruzof Islands.

Most brown and black bear activity along the coast occurs during the spring and summer and consists of scavenging for carcasses and feeding on intertidal invertebrates, such as razor clams. Brown bears have been observed to feed on beached carcasses of marine mammals, especially in the northern areas of the state. Brown bears would also be likely to feed on large terrestrial animals, such as caribou and moose that were disabled or killed by oiling. It is important, therefore, to locate and safely dispose of all oiled carcasses.

Bears are especially active during the salmon season and will congregate along salmon streams throughout the state to feed on live and dead fish. In the early spring, they also forage for emergent vegetation in wetland areas. Therefore, they can ingest oil in the process of feeding or incidentally to grooming. Bears are also capable of swimming and can become externally oiled.

Bears do not appear to avoid oil, and in some cases can be attracted to it. Although there is little specific information available about the sensitivity of brown or black bears to oil, evidence from polar bears suggests that bears may be extremely sensitive to ingested oil and to skin contact with oil.

There is no literature on rehabilitating oiled brown and black bears, although polar bear response information (*USFWS Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page) may be applicable. For example, brown and black bears, like polar bears, may be especially susceptible to hemorrhagic enteritis induced by the stress of capture and transport.

9740.2.3.3.2.1 – Response Strategies

Primary Response strategies should emphasize keeping spilled oil away from bear habitat and should include removal of oiled carcasses plan (Sections [3640.2](#) and [9740.3.2](#)).

Secondary response strategies focus on deterring bears from areas contaminated by an oil spill. This response is appropriate under all circumstances and can be incorporated with primary response strategies. The potential for the animal actually contacting oil should be considered before secondary response strategies are initiated.

A deterrent is any method or device used to keep bears away from a particular location. The best deterrence requires early detection. Detection methods, which may be used in conjunction with deterrents, can include bear monitors, trained dogs, trip wires, and motion sensors.

There are no data indicating that visual or olfactory deterrent methods are effective in keeping bears away from specific sites. Artificial light, such as the electric lighting system at industry sites, may deter some bears at night. Auditory and physical stimuli, especially in combination, have been successfully used to deter bears, although bears may acclimate to auditory deterrence alone. Herding or hazing (dispersal of) polar bears with vehicles, boats, and aircraft has been successfully demonstrated. These methods may be effective when oil is confined to a small area and can be regularly patrolled.

Pre-emptive capture should only be initiated if all other methods under the secondary response strategy are ineffective in deterring bears from a spill site, and is only feasible if small numbers of animals are in danger of being oiled and suitable relocation sites are nearby. The potential for bears to be oiled will need to be high before this technique is initiated. Human safety, as with all spill response operations, is the top priority during all bear response activities.

Tertiary Response. Tertiary response strategies include capturing, handling, transporting, rehabilitating, holding, and releasing bears. Rehabilitation of individual animals may be considered on a case-by-case basis, with pregnant females and sows with cubs given priority. Careful consideration should be made of the added handling stress and the potential for spreading diseases.

Details on hazing, deterrence, and capture of polar bears, which may be applicable for brown and black bears, can be found in the *USFWS Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page. Incident-specific bear safety plans will also outline currently accepted methods for hazing or deterring bears in the spill area.

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

If primary, secondary, or tertiary response strategies are proposed in locations where black or brown bears are or may be present, response personnel must consult with ADF&G regarding the proposed strategies to ensure compliance with state laws and permit requirements.

9740.2.3.3.2.2 – Black and Brown Bear Response Forms and Tools

- Request authorization to conduct black and brown bear response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting response activities are listed in Table 4-2.
- USFWS Oil Spill Response Plan for Polar Bears in Alaska*, available on the ADEC [Area Plan References and Tools](#) web page.
- Carcass collection information plan (Sections [3640.2](#) and [9740.3.2](#)).

9740.2.3.3.3 – Wolves

Wolves occur throughout mainland Alaska, Unimak Island, and on major islands in Southeast Alaska (except for Admiralty, Baranof, and Chichagof Islands). Wolves are susceptible to oil ingestion and external oiling. Ingestion of oil would probably pose the greatest risk to wolves, since they are opportunistic feeders and will consume carcasses found along the beach as well as terrestrial mammals disabled or killed by oil contamination. Anecdotal accounts suggest that wolves can be attracted to oil. Wolves in the northern, western, and southwestern areas of the Alaska have been observed to carry rabies.

9740.2.3.3.3.1 – Response Strategies

Primary Response. Primary response strategies should emphasize keeping spilled oil away from wolf habitat and should include removal of oiled carcasses.

Secondary Response. Secondary response strategies will be evaluated on a case-by-case basis, keeping in mind that deterrence can be labor-intensive, stressful, and dangerous to individual animals, and perhaps only effective for a short time, if at all.

Tertiary Response. Tertiary response strategies are not recommended, since wolves occasionally carry rabies. Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

If primary, secondary, or tertiary response strategies are proposed in locations where wolves are or may be present, response personnel must consult with ADF&G regarding the proposed strategies to ensure compliance with state laws and permit requirements.

9740.2.3.3.3.2 – Wolf Response Forms and Tools

- Request authorization to conduct wolf response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting response activities are listed in Table 4-2.
- Carcass collection information plan (Sections [3640.2](#) and [9740.3.2](#)).

9740.2.3.3.4 – Furbearers

Furbearers addressed in this appendix include red foxes, Arctic foxes, mink, river otters, muskrats, beavers, wolverine, marten, and miscellaneous small mammals.

Aquatic furbearers such as river otters, mink, muskrats, and beavers, spend large amounts of time in the water and rely on their fur for insulation. If externally oiled, these animals could become hypothermic and die. In addition, these species tend to groom frequently to maintain the insulating properties of their fur. This behavior places them at additional risk of ingesting oil. Arctic foxes, while they do not commonly enter the water, likewise rely heavily on their fur for insulation and groom extensively.

Many furbearers are opportunistic scavengers. This includes foxes, river otters, mink, wolverine, and marten. They often search intertidal areas for carcasses, especially during the winter and spring. This behavior places those species at risk of ingesting oiled food. Animals like river otters and mink, which spend considerable time in the water and feed on carcasses, are at highest risk for oil exposure. If oil cannot be contained before it comes ashore, the best strategy is to focus on removing oiled carcasses from habitats used by scavenger species.

There are no manuals on rehabilitating oiled terrestrial furbearers. However, protocols and procedures developed for sea otters are likely relevant to aquatic furbearers. See *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.

9740.2.3.3.4.1 – Response Strategies

Primary Response. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Secondary Response. Secondary response strategies will be evaluated on a case-by-case basis, keeping in mind that deterrence can be labor-intensive, stressful, and dangerous to individual animals, and perhaps only effective for a short time.

Tertiary Response. Capturing and rehabilitating oiled furbearers is not recommended. Rehabilitation of individual animals can be considered for humane reasons on a case-by-case basis, or potentially for aquatic furbearers that may have similar cleaning and care requirements to sea otters. Careful consideration should be made of the added, handling stress and the potential for spreading diseases.

Foxes (red and Arctic) are vectors for rabies in Alaska and should never be pre-emptively captured or captured and rehabilitated.

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

If primary, secondary, or tertiary response strategies are proposed in locations where furbearers are or may be present, response personnel should consult with ADF&G regarding the proposed strategies to ensure compliance with state laws and permit requirements.

9740.2.3.3.4.2 – Furbearer Response Forms and Tools

- Request authorization to conduct furbearer response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs ([Section 9740.3.7](#)).
- Permits required for conducting response activities are listed in Table 4-2.
- *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page.
- Carcass collection information plan (Sections [3640.2](#) and [9740.3.2](#)).

9740.2.3.3.4.3 – Species Information

Red Foxes

Red foxes are found throughout the state, except for the western Aleutian Islands, Prince William Sound, and some islands in Southeast Alaska. Red foxes feed on a wide variety of coastal organisms and can be expected to scavenge whatever they find (including carcasses), especially during the winter and spring. Foxes, like many other mammals, often use beaches for travel routes, particularly when the snow is deep. Therefore, red foxes can ingest oil and become oiled externally following an oil spill in those areas.

Red foxes are one of the primary vectors for rabies in northern, western, and southwestern Alaska.

Response Strategies

Primary and Secondary Responses. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Tertiary Response. Tertiary response strategies are not recommended, since red foxes occasionally carry rabies. Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

Arctic Fox

Arctic foxes are ubiquitous in treeless coastal areas of the state. Their range extends from the Arctic Slope, through western and southwestern Alaska, and onto the Aleutian chain. Their numbers are subject to severe natural fluctuations. Although foxes are mostly solitary, concentrations of tens to hundreds have been observed scavenging around large food sources, such as whale carcasses, polar bear kills, or dumps.

Arctic foxes are particularly susceptible to oil contamination because they: (1) inhabit coastal areas and pack ice, (2) spend a considerable amount of time scavenging and could contact oiled carcasses, (3) groom extensively and could ingest oil, and (4) break into ringed seal lairs to hunt for newborn seals and could encounter oil brought to the lair by an oiled seal. Since an Arctic fox's chief protection against the cold is a thick coat that traps air, it is subject to hypothermia if its coat becomes matted by oil.

Arctic foxes are one of the primary vectors for rabies in northern, western, and southwestern Alaska.

Response Strategies

Primary and Secondary Responses. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Tertiary Response. Tertiary response strategies are not recommended for any reason since Arctic foxes occasionally carry rabies. Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

Mink

Mink are found throughout the state, except for Kodiak Island, the Aleutian Islands, and most of the Arctic Slope. Mink commonly occur in both coastal and inland riparian areas. Mink living in coastal areas frequently cross the intertidal zone and spend large amounts of time swimming and diving for food. They also scavenge for carcasses, especially during the spring. Consequently, contamination of mink fur by oil could occur, which would result in a loss of insulation and hypothermia. Mink also groom frequently and could ingest oil by grooming or eating oiled food. Due to these behavioral characteristics, mink are one of the furbearing species at greatest risk from an oil spill.

Response Strategies

Primary and Secondary Responses. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Tertiary Response. Capturing and rehabilitating mink is not recommended. Rehabilitation of individual animals can be considered for humane reasons on a case-by-case basis. Careful consideration should be made of the added handling stress and the potential for spreading diseases. The manuals on cleaning sea otters are generally applicable to cleaning mink and other aquatic furbearers (see *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page).

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

River Otters

River otters occur throughout Alaska, except for the Aleutian Islands and the area north of the Brooks Range. Like mink, river otters spend a great deal of time swimming and diving in nearshore and inland riparian areas for food. While they generally prefer live prey, river otters are also opportunistic feeders and will eat carcasses found in intertidal areas. While in the water or traversing the intertidal zone, their fur can become oiled, resulting in a loss of insulation and hypothermia. River otters also groom frequently and can ingest oil as a result. Along with mink, river otters are one of the furbearing species at greatest risk during an oil spill.

Response Strategies

Primary and Secondary Responses. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Tertiary Response. Capturing and rehabilitating river otters is not recommended. Rehabilitation of individual animals can be considered for humane reasons on a case-by-case basis. Careful consideration should be made of the added handling stress and the potential for spreading diseases. The manuals on cleaning sea otters are generally applicable to cleaning river otters and other aquatic furbearers (see *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page).

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

Muskrats

Muskrats occur throughout most of the Alaska mainland, except for the southern Alaska Peninsula and areas north of the Brooks Range. Muskrats live in and around wetland areas and generally feed on aquatic vegetation, invertebrates, and fish. Therefore, they are subject both to ingesting oil on their food and external oiling. Once their fur becomes oiled, it rapidly loses its insulating properties and muskrats can become hypothermic. Muskrats also groom frequently and can ingest oil as a result. Significant muskrat mortalities have been noted following past oil spills in inland waters.

Response Strategies

Primary and Secondary Responses. Primary response strategies should emphasize keeping spilled oil away from furbearer habitat and should include removal of oiled carcasses.

Tertiary Response. Capturing and rehabilitating muskrats is not recommended. Rehabilitation of individual animals can be considered for humane reasons on a case-by-case basis. Careful consideration should be made of the added handling stress and the potential for spreading diseases. The manuals on cleaning sea otters are generally applicable to cleaning muskrats and other aquatic furbearers (see *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) web page).

Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with incident-specific carcass collection protocols.

1 Beaver

2 Beavers are present throughout most of the forested areas of the state, including Kodiak Island. They
3 inhabit inland ponds, lakes, and streams and rely on their fur for insulation. Accordingly, they are at risk
4 from external oiling, which could result in hypothermia. Grooming behavior and consumption of
5 contaminated aquatic plants could also result in oil ingestion.

6 Response Strategies

7 **Primary and Secondary Responses.** Primary response strategies should emphasize keeping spilled oil
8 away from furbearer habitat and should include removal of oiled carcasses.

9 **Tertiary Response.** Capturing and rehabilitating beavers is not recommended. Rehabilitation of
10 individual animals can be considered for humane reasons on a case-by-case basis. Careful consideration
11 should be made of the added handling stress and the potential for spreading diseases. The manuals on
12 cleaning sea otters are generally applicable to cleaning beavers and other aquatic furbearers (see
13 *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and](#)
14 [Tools](#) web page).

15 Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with
16 incident-specific carcass collection protocols.

17 Wolverine

18 Wolverines are present throughout most of mainland Alaska and are found in both inland and coastal
19 areas. Wolverines may be attracted to coastal areas to feed on carcasses of all types, including marine
20 mammals, fish, and birds. As a result, wolverines could ingest oil or become oiled externally. They
21 frequently tend to scavenge in intertidal areas during the winter and spring. In addition, they often use
22 beaches as winter and spring travel routes.

23 Response Strategies

24 **Primary, Secondary, and Tertiary Response.** Primary response strategies should emphasize keeping
25 spilled oil away from furbearer habitat and should include removal of oiled carcasses.

26 Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with
27 incident-specific carcass collection protocols.

28 Martens

29 Martens are present throughout most of the forested portions of Alaska. Martens live along inland bogs
30 and streams as well as in coastal areas. They commonly feed on birds and small rodents. Since martens
31 are opportunistic feeders, they could potentially scavenge oiled carcasses, including salmon.

32 Response Strategies

33 **Primary, Secondary, and Tertiary Response.** Primary response strategies should emphasize keeping
34 spilled oil away from furbearer habitat and should include removal of oiled carcasses.

1 9740.2.3.3.5 – *Miscellaneous Small Mammals*

2 Small mammals, such as ground squirrels, voles, lemmings, and hares are ubiquitous throughout the
3 state, and undergo large fluctuations in numbers.

4 If primary, secondary, or tertiary response strategies are proposed in locations where small mammals
5 are or may be present, response personnel must consult with ADF&G regarding the proposed strategies
6 to ensure compliance with state laws and permit requirements.

7 9740.2.3.3.5.1 – Response Strategies

8 **Primary Response.** Primary response strategies need to emphasize keeping spilled oil away from small
9 mammal habitat.

10 **Secondary Response.** Secondary response strategies are not recommended.

11 **Tertiary Response.** Tertiary response strategies are not recommended. Rehabilitation of individual
12 animals can be considered for humane reasons on a case-by-case basis. Careful consideration should be
13 made of the added handling stress and the potential for spreading diseases.

14 Severely oiled individuals should be euthanized and their carcasses disposed of in accordance with
15 incident-specific carcass collection protocols.

16 9740.2.3.3.5.2 – Small Mammal Response Forms and Tools

- 17 • Request authorization to conduct furbearer response activities (hazing/deterrence, pre-emptive
18 capture and related activities, or oiled animal capture and related activities) in Startup or
19 Comprehensive WRPs ([Section 9740.3.7](#)).
 - 20 • Permits required for conducting response activities are listed in Table 4-2.
 - 21 • Carcass collection information plan (Sections [3640.2](#) and [9740.3.2](#)).
- 22

1 9740.3 – Wildlife Response Tactics, Guidelines, and Forms

2 The following sections contain the tactics, guidelines, and forms referenced in the WPG. The annual
3 update process will include additional or updated tactics, guidelines, and forms. Full-page Tactics and
4 Forms for printing, and fillable PDF files (for applicable forms) will be available at the ADEC [Area Plan](#)
5 [References and Tools](#) web page.

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- 1 9740.3.1 – *Tactic: Wildlife Reconnaissance (Recon)*
- 2 A grab-and-go version of this tactic begins on the following page, and a version suitable for printing will
- 3 be available at the ADEC [Area Plan References and Tools](#) web page. Please check this website for the
- 4 most recent versions.

DRAFT

TACTIC: WILDLIFE RECONNAISSANCE (RECON)

Objective and Strategy

- Identify and locate any wildlife that may be present and affected by a spill or response activities.
- Incidental wildlife (marine or terrestrial mammals, birds, fish, and invertebrates) observations can be made by any spill responder. Systematic wildlife observations are the primary responsibility of Wildlife Observers.

Tactic Description

- Look for, record information, and report wildlife that are:
 - In oiled areas;
 - In areas at risk of becoming oiled; and
 - Where affected wildlife are likely to travel (e.g., onshore).
- At a minimum, report this information:
 - **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales and 5 seals)
 - **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out, floating/sitting in the water, transiting in a northerly direction)
 - **Where are they?** (preferably latitude/longitude, but could also be description, e.g., “nearshore/shoreline approximately 1 kilometer west of oil, in [name of] Bay”)
 - **Any other details** (e.g., degree of oiling).
 - **Photos and video** are helpful.
- Wildlife Observers follow general or spill-specific protocols to systematically search for, identify, record, and report marine and terrestrial mammal, bird, and fish observations in the vicinity of the spill and response activities. They:
 - Survey numbers of wildlife using replicable methods;
 - Collect or verify baseline information;
 - Identify priority species and habitats;
 - Locate oiled individuals; and

- Monitor oil spill impacts on wildlife through time, including impacts on animal behavior.

Safety Considerations

- Bear guards should be used when working on land or in near-shore environments when bears may be present, or as instructed by the Safety Officer.
- Observers should exercise situational awareness depending on their observation platform. For example, slips, trips, and falls are a particular hazard on land and Personal Floatation Devices must be worn on vessels.
- Traveling on steep or unstable surfaces (cliffs, mud, exposed slopes, shoreline rocks with surf, etc.) must be avoided.
- Personal protective equipment (PPE; e.g., oil-resistant outwear such as Tyvek coveralls) will be determined by the Safety Officer and is dependent on the potential exposure to oil in the observing environment.

Operational Considerations

Operating Environments, Geographic Considerations and Access

- Wildlife observation may be performed in all environments where a spill can occur (inland; on lakes, streams, and rivers; on marine shorelines; and in the marine nearshore and open-water environments).
- Observers may operate from one or more platforms, including on foot, in a vehicle or vessel, or by aircraft.
- Observers must avoid unnecessary disturbance to wildlife while conducting wildlife observations.
- Use of unmanned aircraft systems (UASs or drones) is not covered in this Tactic.

Species Type and Life Stage

- Incidental wildlife observations can be made by any responder, from any platform.
- Wildlife Observers may use species-specific or platform-specific protocols, such as marine mammal shipboard surveys or waterfowl aerial surveys.

- Be aware of species-specific requirements for non-approach zones (setback distances), sensitive time periods, and other factors to prevent or minimize disturbance.

Communications

- Ensure all forms are accurate and complete at the end of each shift.
- Incident-specific observation or survey protocols may identify specific communication requirements such as reporting thresholds to Incident Command and wildlife agencies.
- **All responders** can report wildlife observations through their supervisor to the Incident Command. Reports must include (at minimum):
 - **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales and 5 seals)
 - **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out, floating/sitting in the water, transiting in a northerly direction)
 - **Where are they?** (preferably latitude/longitude, but could also be description, e.g., “nearshore/shoreline approximately 1 kilometer west of oil, in [name of] Bay”)
 - **Any other details** (e.g., degree of oiling).
 - **Photos and video** are helpful.
- **Wildlife Observers** will follow incident-specific protocols for providing forms to USFWS, NMFS, ADF&G, and the Documentation Unit.

Table 9-6: Equipment, Vehicles or Vessels, and Personnel for Wildlife Recon Tactic (begins on next page).

Table 9-6: Equipment, Vehicles or Vessels, and Personnel for Wildlife Recon Tactic.

EQUIPMENT		QUANTITY	FUNCTION/NOTES
Binoculars		1	Observe and identify wildlife to species.
GPS (with track-line function if available)		1	Set to Datum WGS84. Track-line can be uploaded to GIS.
Camera (with geo-referencing if available)		1	For documenting large groupings or significant observations. Geo-referenced photographs can be uploaded to GIS.
Wildlife Observation Forms		10	Print Wildlife Observation Forms on water-resistant (Rite-in-Rain) paper, for filling out in field or for transferring device app information, if that is required. Observations may be collected using devices (tablet computer, cell phone). Device apps may be developed for an incident.
Incident-specific Wildlife Observation Protocol		1	Allows designated Wildlife Observers to collect comprehensive and scientifically defensible Wildlife Observations. If no incident-specific plan developed, follow Wildlife Recon Tactic.
Pens/pencils		5 each	
PPE		As needed for each responder	Protect personnel from platform-specific hazards. Platform-specific (e.g., PFD for boat-based surveys)
VESSEL/VEHICLES		QUANTITY	FUNCTION/NOTES
Varies. May include trucks, ATVs, boats, or aircraft.		Varies with incident	Enable Wildlife Observers to access survey area and conduct survey.
PERSONNEL	TACTIC-SPECIFIC TRAINING	QUANTITY	FUNCTION/NOTES
Field Team Leader	Experience using binoculars to find and identify wildlife, and experience and training in identifying wildlife species in Alaska.	Varies with incident	Serves as primary Wildlife Observer; supervises field operations and is responsible for communication with Incident Command.
Wildlife Observer	Same as Field Team Leader	Varies with incident	Observe wildlife; record data.
Any Responder			Communicate any wildlife observations especially in first 24 -48 hours of spill, to supervisor or Unified Command.

IMPLEMENTATION

All Responders: Report wildlife observations through supervisor to Unified Command, including (as practicable):

1. **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales, 5 seals)
2. **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out, floating/sitting in the water, transiting in a northerly direction)
3. **Where are they?** (preferably latitude/longitude or, e.g., “nearshore/shoreline approximately 1 kilometer from oil, in [name of Bay”)
4. **Other relevant details** (e.g., degree of oiling, if observed).
5. **Photos and video** are helpful.

Wildlife Observers

1. Preparation:
 - a. Determine appropriate observation platform and ensure that Wildlife Observers have all required platform-specific training and PPE (e.g., Personal Floatation Device for boat-based recon).
 - b. Obtain and review standard survey methods for specific platform or any incident-specific survey protocols. Obtain Permits and Authorizations (if needed) for specific method/protocol. Obtain landowner permission if required.
 - c. Obtain equipment, Wildlife Observation Forms (print on Rite-in-the-Rain® or other water-resistant paper; below).
 - d. Obtain map/charts/aerial photos of area to be surveyed.
 - e. Coordinate with Mapping Specialist as needed to determine incident-specific format of any electronic data such as track-lines, waypoints, data file transfers, geo-referenced photos, etc.
 - f. Coordinate timing of surveys through Operations to ensure platforms and resources are available and to prevent interference with other response activities.
2. Field Implementation:

- a. Conduct surveys, record on map the area travelled and surveilled, take photographs.
- b. Follow instructions on back of form while filling them out and ensure documentation is complete and accurate at the end of each shift.
- c. For long term events, establish a routine and consistent survey schedule.

3. Deliverables (end-of-shift):

- ☐ Completed Wildlife Observation Form for each area surveyed.
- ☐ Map of areas travelled and surveyed.
- ☐ Any other documentation required by incident-specific protocols and formats.
- ☐ SD cards, cameras, and GPS units turned in or data downloaded.

Notes:

Related Tactics

- Carcass Collection

References

None in this version.

Forms (on following pages; print on water-resistant paper)

- Figure 9-1: Wildlife Observation Form -- print landscape orientation on one sheet of water-resistant paper with two sides.

Figure 9-1: Wildlife Observation Form (two pages).

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Wildlife Observation Form Return form(s) to Supervisor, Wildlife Branch, or wildlife agency representative			Incident Name:		Date (MM/DD/YYYY):	INV (OLE Use Only):
ICS Position (Group, Task Force, Strike Team, or other name if no ICS Position):			Lead Observer Name & Employer (Phone & Email if no ICS Position): Training/Experience:			
Other Observer(s) Names & Employers:						
General Location:		GPS Datum: WGS84 (preferred) <input type="checkbox"/> ; NAD83 <input type="checkbox"/> ; NAD27 <input type="checkbox"/> ; Other: _____		Camera & SD Card ID #: GPS & SD Card ID #:		
For surveys, GPS Trackline File Name: _____ Total distance surveyed: _____ mi <input type="checkbox"/> or km <input type="checkbox"/>						
OBSERVATION INFORMATION						
Platform: On foot <input type="checkbox"/> Truck/4-wheeler <input type="checkbox"/> Vessel <input type="checkbox"/> Aircraft <input type="checkbox"/> Other <input type="checkbox"/>		Platform Description:				
Cloud Cover (%) _____		Wind Speed _____ mph <input type="checkbox"/> knots <input type="checkbox"/> OR Beaufort Wind Scale (1-6): _____			Direction wind is blowing from: _____	
Precipitation: None <input type="checkbox"/> Fog/Mist <input type="checkbox"/> Light Rain <input type="checkbox"/> Heavy Rain <input type="checkbox"/> Snow <input type="checkbox"/>					Visibility: Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor <input type="checkbox"/>	
Time	Latitude (decimal degrees)	Longitude (decimal degrees)	Species/ Species Group	ID Certainty	#	Details
						START SURVEY (write time, location)

						END SURVEY (write time, location)

Example:

Time	Latitude (decimal degrees)	Longitude (decimal degrees)	Species/ Species Type	ID Certainty	#	Details
0800	57.70818 N	-52.32819 W	seabirds	certain	20	<i>mixed seabird flock incl 10 least auklets; feeding, not traveling, 2 km from oil, no visible oiling, WP 33</i>

INSTRUCTIONS: Wildlife Observation Form (or follow incident-specific protocols if available)

Incident Name and Date: Fill out.	ICS Position: ICS Position of Wildlife Observer(s), if applicable. Record other identifier if no ICS position.		Lead Observer: Record information <i>for</i> lead Wildlife Observer (person with the most training/experience). Training/Experience: May include but not be limited to applicable degree, employer training, USFWS/NMFS training, etc.	
Other Observer(s): Record information for other Wildlife Observers.		General Location: General location of observations, from navigational charts or maps (<i>Ex: Growler Bay</i>).		GPS Datum: Check one (found in GPS settings). WGS84 is preferred.
Camera/GPS & SD Card IDs: Write ID numbers of assigned camera and GPS unit and SD cards (memory cards).			GPS Trackline File Name: For incident-specific protocols, record trackline file saved in your GPS. Total Distance Surveyed: record with units.	
Platform: Check one.	Platform Description: Record type, name, and identifying numbers/letters of vessel/vehicle/aircraft. If Other, provide details in description.			Cloud Cover: Estimate percentage.
Wind Speed: Record with units OR Beaufort Wind Scale: 0: 0-1 mph, calm, flat seas 1: 1-3 mph, ripples 2: 4-7 mph, light breeze, wavelets 3: 8-12 mph, gentle breeze, large wavelets, some breaking crests 4: 13-18 mph, moderate breeze, small waves, many whitecaps 5: 19-24 mph, fresh breeze, 6-9 ft waves, some spray 6: 25-31 mph, strong breeze, large waves with spray >6: 32+ mph				Direction wind is blowing from: Record direction. Precipitation: Check one. Visibility: Check one. Excellent = unlimited; poor = <100 m
Time: 24-hour format.	Latitude and Longitude: Decimal Degrees preferred. Regardless of format used, include any decimals and symbols for degrees/minutes/seconds. If no GPS unit is available, describe observation location as detailed as possible.			Species: Record the species as precisely as you can. For example, you might ID a gull as "mew gull" (to species), or as "unidentified gull" or "bird."
ID Certainty: CERTAIN: You are quite sure of the species or species type. MAYBE: You have some question about the species or species type. UNCERTAIN: You do not know the species or species type.		#: Number of birds or animals observed of the same species/species group.	Details: Note any additional details, including: GPS waypoint (WP); size, age, or sex of animals; behavior (feeding, preening, loafing, or other); distance to oil; photo numbers; record degree of oiling; any other info you think important. Degree of oiling codes: NO =no obvious oil on body. LT =light spots of oil. MOD =moderate patches over body. HV =heavily oiled all over. UNK =unknown	

Wildlife Observation Form - Version 12/2019 (back page)

DRAFT

- 1 9740.3.2 – Tactic: Collection of Small Carcasses and Documentation of Large Carcasses
- 2 A grab-and-go version of this tactic begins on the following page, and a version suitable for printing will
- 3 be available at the ADEC [Area Plan References and Tools](#) web page. Please check this website for the
- 4 most recent versions.
- 5

DRAFT

TACTIC: COLLECTION OF SMALL CARCASSES AND DOCUMENTATION OF LARGE CARCASSES

Objective and Strategy

- Remove oiled and unoled carcasses from the environment to prevent secondary contamination of scavengers.
- Document carcass species, locations, and other information to evaluate the impact of the spill on affected populations and to assess overall impact of a spill event on the environment.

Tactic Description

- Carcasses that are small enough to be removed from the environment (e.g., fish, shellfish, small mammals, and birds) need to be documented, collected, and transferred or disposed of according to protocol. Often, carcasses will be delivered to a wildlife agency representative at a single location – the Evidence Custodian at the morgue facility.
- Carcasses that are too large to remove from the environment need to be documented and perhaps sampled. Sample collection from large carcasses is not included in this tactic.
 - For large carcass sampling, see “Dead Marine Mammal Recovery and Field Processing Procedures” in the NMFS *Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines*, available on the [NOAA Institutional Repository](#).

Safety Considerations

- Bear guards should be used where bears may be present, or as determined by the Safety Officer.
- Slips, trips, and falls are a particular hazard for carcass collection because people may be focused on searching for carcasses while walking in rough, slippery terrain.
- Avoid steep and unstable surfaces (cliffs, mud, exposed slopes, shoreline rocks with surf, etc.).
- Primary PPE for carcass collection are nitrile gloves. Other PPE (e.g., oil-resistant outerwear such as Tyvek coveralls) will be determined by the Safety Officer, and is dependent on the level of carcass oiling, amount of oil in the environment, and weather.

Operational Considerations

Operating Environments, Geographic Considerations, and Access

- Carcass collection may be performed in all environments where a spill can occur, including:
 - On land;
 - Lakes, streams, and rivers and associated shorelines;
 - Marine shorelines, marine nearshore, and open water.
- Responders may search for carcasses on foot or by vehicle (snow machine, truck, ATV, boat, aircraft) depending on the size, location, and complexity of the spill; terrain; and land ownership/access.
- While carcass collection and disposition procedures will follow this tactic, how those carcasses are found – carcass surveys – may vary depending on the size, location, and complexity of the spill; survey protocols may be incident-specific.

Species Type and Life Stage

- **Birds and small mammals:** Collect partial carcasses and intact, whole birds and small mammals, regardless of degree of scavenging, disintegration, or decomposition. Do not collect single feathers, or feather or fur clumps, that are not attached to skin or other body part. Collect disarticulated carcasses (those in separate pieces) by bagging and tagging all pieces that likely came from the same animal as one whole animal.
- **Large mammals (adult bears, whales, seals, sea lions, walruses, and some ungulates):** Response personnel should notify Unified Command immediately upon finding carcasses that are too large to be collected. These must be documented by the carcass collection team and may subsequently be sampled by separate agency or authorized personnel. Carcasses of young large mammals such as cubs or calves should be collected when possible. Collect disarticulated carcasses (those in separate pieces) by bagging and tagging all pieces that likely came from the same animal as one whole animal.
- **Other aquatic species (fish, shellfish, and invertebrates):** Collect partial and intact whole carcasses, regardless of degree of scavenging, disintegration, or decomposition. If large numbers of disarticulated or very small carcasses are found, incident-specific protocols may be developed to facilitate their collection.
- **Oily waste:** Oiled carcasses are considered oily waste. Any oiled carcasses, such as large mammals or a large fish kill, that are not transported to the Evidence Custodian or morgue must be documented and disposed of according to the incident Waste Management Plan, after approval by wildlife agencies.

Communications

- Ensure all forms and tags are accurate and complete at the end of each shift.
- Follow incident-specific procedures to submit forms to USFWS, NMFS, ADF&G, and the Documentation Unit. Ensure tags will stay with the carcasses.
- Follow incident-specific reporting thresholds (e.g., report any and all protected species) to Unified Command and wildlife agencies.
- All responders should immediately report observations of carcasses through their supervisor to Unified Command. Reports must include (at a minimum):
 1. Observer name, time, date, and location (latitude/longitude and location description);
 2. Species or species group and numbers of each species observed;
 3. Estimated degree of oiling and location of carcass relative to known oiled area;
 4. Photographs, if possible.

Table 9-7: Equipment, Vehicles or Vessels, and Personnel for Carcass Collection Tactic (begins on next page).

Table 9-7: Equipment, Vehicles or Vessels, and Personnel for Carcass Collection Tactic.

EQUIPMENT	QUANTITY	FUNCTION/NOTES
Personal Protective Equipment (PPE)	As needed	Ensure safety of responders
GPS Unit	1	Document locations
Camera	1	Documentation
Photo scale	1	Documentation
Binoculars	1 per person or team	Search for carcasses; situational awareness
Extra batteries for GPS unit and camera	1 set each	Avoid electronics down time
Carcass Collection Kit (for 10 small birds or mammals, 1-3 eagles, 1-3 sea otters)	1 or more	Enable the safe and proper collection and documentation of carcasses.
Large/XL Cooler or tote	1	Wheeled if possible
Paperwork:		
Incident-specific maps or shoreline segment maps	1 set	
Carcass Chain of Custody (CoC) Tags (white)	15	
Pre-printed Individual Carcass Identification Tags (yellow)	15	If pre-printed tags are unavailable, use water-resistant labels with: date, time, location, collector's name, and an assigned sequential carcass ID number.
Carcass Collection Forms	5	Print forms on water-resistant (e.g., Rite-in-the-Rain®) paper.
Ziploc® bags for Carcass Collection Forms	5	
Carcass Collection Protocol	1	Print on water-resistant (e.g., Rite-in-the-Rain®) paper.
Transport Log for Carcasses	10	For use by Transporter – may be with them. Print on water-resistant (e.g., Rite-in-the-Rain®) paper.
Pencil and permanent pen (e.g., Sharpie®)	5 each	
Clipboard	1	
Printed permits and authorizations	1 or more	May be from multiple agencies (USFWS, NMFS, and ADF&G) and landowners.
Water resistant field notebook	1 per person	
Collection supplies:		
Brown (kraft) paper bags, small	10	Lunch bags
Brown (kraft) paper bags, large	6	Leaf or lawn bags
Non-coated (e.g., kraft) roll of paper	1	If carcasses larger than will fit in a large paper bag are anticipated.

EQUIPMENT		QUANTITY	FUNCTION/NOTES
Plastic bags, small (e.g., gallon size Ziplocs®)		10	
Plastic bags, large (e.g., kitchen trash bags, compactor bags)		10	
Twist ties, zip-ties, or wire ties		1 packet	
Nitrile gloves, one-size-fits-all		25 pairs	
Field scissors or knife		1	
Flagging		1 roll	
Ice packs		4	If available.
VESSEL/VEHICLES		QUANTITY	FUNCTION/NOTES
Various depending on spill environment, size, and complexity. May include trucks, ATVs, boats, or aircraft, etc.		Varies	Enable carcass collectors to search, locate, retrieve, and transport carcasses to central location (morgue).
PERSONNEL	TACTIC-SPECIFIC TRAINING	QUANTITY	FUNCTION/NOTES
Carcass Collector	Carcass collection training	1	Supervises field operations and physically handles and bags carcasses.
Data Recorder	Carcass collection training	1	Completes forms, photo-documentation, records GPS coordinates (Lat/Long), and performs other administrative duties.
Transporter	Transporter training	Various, depending on complexity of incident	Transfers carcasses from field collection location to central location (morgue).
Evidence Custodian/ Designated Agency Personnel		1 or more	Receives carcasses and documentation from field teams; often are USFWS or NMFS law enforcement personnel.

Notes:

Implementation

1) Preparation:

- Obtain PPE, equipment, and printed copy of Permits and Authorizations.
- Ensure activities can be safely conducted.
- Determine if Bear Guards are needed for shoreline or inland activities in accordance with Safety Plan.

2) Field Implementation (see also Figure 9-2: Carcass Collection Job Aid For Small Carcasses)

- RECORDER:** Complete top of Carcass Collection Form, following instructions on back of form.
 - Fill out the shoreline search section of the form only if instructed to do so, using incident-specific protocols.
 - Take photos as needed to document carcasses in the field.
- COLLECTOR:** Wearing new nitrile gloves, place individual carcass in paper bag, then in clear plastic bag. For larger carcasses, wrap in uncoated (e.g., kraft) paper and then place in larger plastic bags.
 - Do NOT put carcasses directly in plastic bags.
 - Do NOT place nitrile gloves in bag with carcasses.
- RECORDER:** Complete a yellow Individual Carcass Identification Tag for each carcass.
 - The Carcass Chain of Custody (CoC) Tag # is the Batch Tag No. on the Carcass Chain of Custody (CoC) Tag:

CARCASS CHAIN OF CUSTODY TAG	
COLLECTION DATE: (MM/DD/YYYY)	BATCH TAG NO. 1060

INDIVIDUAL CARCASS IDENTIFICATION TAG		
CARCASS CHAIN OF CUSTODY (CoC) TAG #	CARCASS ID #	DATE (MM/DD/YYYY)
LOCATION (Lat/Long)		COLLECTION TEAM LEADER (Printed Name)

- The Carcass ID # on Individual Carcass Identification Tag is the pre-printed number from the next blank line on the Carcass Collection Form.

INDIVIDUAL CARCASS IDENTIFICATION TAG		
CARCASS CHAIN OF CUSTODY (CoC) TAG #	CARCASS ID #	DATE (MM/DD/YYYY)
LOCATION (Lat/Long)		COLLECTION TEAM LEADER (Printed Name)

Carcass ID #	Latitude (decimal degrees)	Longitude (decimal degrees)
01		
02		
03		

- Individual Carcass Identification Tags may be a color other than yellow. If pre-pre-printed Individual Carcass Identification Tags are not available, use waterproof paper to create a tag and write the date, time, location (Lat/Long), and Collector's Name on it.

- d) **COLLECTOR:** Tie completed Individual Carcass Identification Tags to each plastic carcass bag.
- e) **RECORDER:** On the Individual Carcass Log section of the Carcass Collection Form, complete the line corresponding to the selected Carcass ID No. (Lat/Long, Species, Condition, etc.):

INDIVIDUAL CARCASS LOG							
Carcass ID #	Latitude (decimal degrees)	Longitude (decimal degrees)	Species	Condition FRESH, DEG, MUM	Oiling NO, LT, MOD, HV, UNK	Photo #	Comments
01							
02							
03							

- f) **COLLECTOR:** Place bagged and tagged carcasses inside of larger plastic “batch” bag.
- A “batch” is the number of animals that fit inside a large plastic bag and will vary from 1 to 10 carcasses depending on species size and number of carcasses.
- g) **RECORDER AND COLLECTOR:** Repeat Steps b-f until the batch is complete.
- Start a new “batch” when: 1) Ten carcasses have been collected (and Carcass Collection Form is complete); 2) Batch bag is full; or 3) Moving to a new area.
- h) **RECORDER:** Place completed Carcass Collection Form in a re-sealable, waterproof (e.g., Ziploc®) bag. Place this bag inside the batch bag but outside of any individual carcass bag.
- i) **RECORDER:** Complete and sign a Carcass Chain of Custody (CoC) Tag for each batch of carcasses.
- j) **COLLECTOR:** Tie completed, signed Carcass Chain of Custody (CoC) Tag to outside of batch bag.
- k) **RECORDER:** For carcasses too large to collect, take photographs and write in field notebook:
- Personnel name(s), time, date, and location (Lat/Long and description);
 - Species or species group and numbers of each species observed;
 - Estimated degree of oiling and location of carcass relative to known oiled area;
 - Number and location of photographs.

3) Transport and Storage

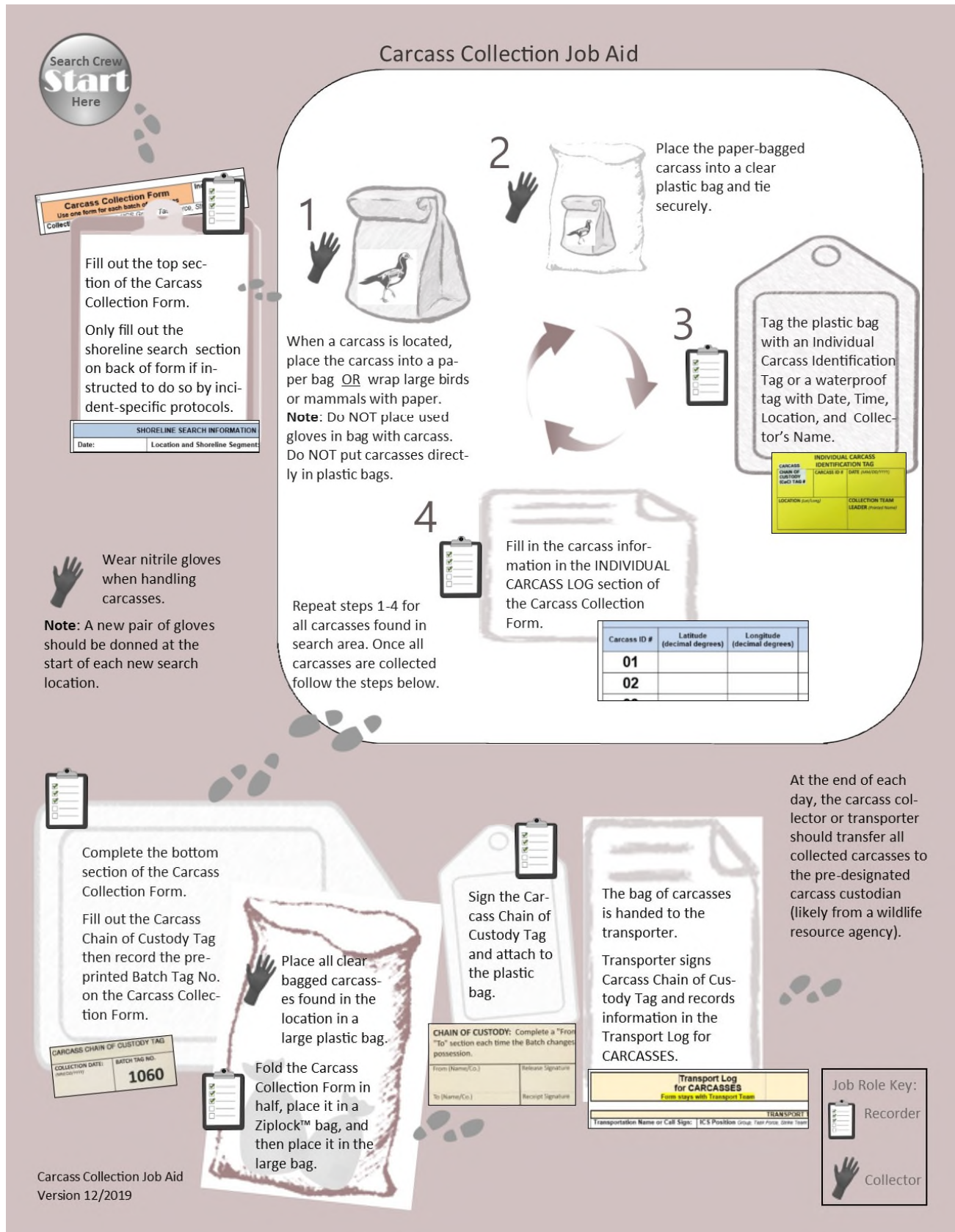
- a) **RECORDER AND TRANSPORTER:** Sign Carcass Chain of Custody (CoC) Tag when carcasses are transferred.
- b) **TRANSPORTER:** Complete Transport Log for Carcasses following instructions on back of form.
- c) **TRANSPORTER:** Keep carcasses as cool as possible.
- d) **TRANSPORTER:** Deliver carcasses to additional TRANSPORTER if needed (i.e., from vessel to vehicle) or to agency-designated Evidence Custodian at morgue or designated transfer point.
- The Carcass Chain of Custody (CoC) Tag is signed by both TRANSPORTERS each time the carcasses change possession.
 - The Evidence Custodian will sign the Carcass Chain of Custody (CoC) Tag, and inspect and catalogue all collected carcasses, then ensure storage until plans are made for final disposal.

1
2 4) Deliverables

- 3 ☐ Correctly bagged carcasses and batches of carcasses.
4 ☐ Completed Individual Carcass Identification Tag for each carcass.
5 ☐ Completed Carcass Chain of Custody (CoC) Tag for each “batch” of 1-10 carcasses.
6 ☐ Completed Carcass Collection Form for each “batch” of 1-10 carcasses.
7 ☐ Completed Transport Log for Carcasses for each shift and mode of transportation.
8 ☐ Copies of field notebooks and photographs for each shift.
9 ☐ SD cards, cameras, and GPS units turned in or data downloaded.

10
11 Notes:
12

1 Figure 9-2: Carcass Collection Job Aid for Small Carcasses



2

Additional Resources for Large Carcasses

- Equipment lists for sampling and collection of large carcasses, especially marine mammals, can be found in “Appendix 5: Equipment Lists Per Response Activity” in the in the NMFS *Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines*, the [NOAA Institutional Repository](#).

Related Tactics

- Wildlife Reconnaissance (Recon)

References

- National Marine Fisheries Service. 2017. NMFS Arctic Marine Mammal Disaster Response Guidelines. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/AKR-16. 81 p. doi: 10.7289/V5/TM-F/AKR-16. Available at the [NOAA Institutional Repository](#).
- National Marine Fisheries Service. 2019. Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines. NOAA Fisheries Guidance Document. pp 80 + appendices. Available at the [NOAA Institutional Repository](#).
- Ziccardi, M.H., S.M. Wilkin, T.K. Rowles, and S. Johnson. 2015. Pinniped and Cetacean Oil Spill Response Guidelines. U.S. Dept. of Commerce, NOAA. NOAA Technical Memorandum NMFS - OPR - 52, 138 p. Available at the [NOAA Institutional Repository](#).

Forms (on following pages; print on water-resistant paper)

- Figure 9-3: Carcass Collection Form (two pages, one sheet of paper, print in landscape orientation)
- Figure 9-4: Individual Carcass Identification Tag (pre-printed, as pictured, or use a water-resistant blank, two sides)
- Figure 9-5: Carcass Chain of Custody (CoC) Tag (pre-printed or use a water-resistant blank, two sides)
- Figure 9-6: Carcass Intermediate Transporters Log (two pages, one sheet of paper, print in landscape orientation)

Figure 9-3: Carcass Collection Form (two pages).



Carcass Collection Form Use one form for each batch of carcasses			Incident Name:		Today's Date (mm/dd/yyyy):		INV (OLE Use Only):	
ICS Position (Group, Task Force, Strike Team, or other name if no ICS Position assigned):					Carcass Collector Name & Employer (Phone & Email, if no ICS position):			
Data Recorder Name & Employer (Phone & Email, if no ICS position):					Have carcass collection permits & authorizations been obtained? YES <input type="checkbox"/> If not, Do Not Collect Carcasses			
Camera & SD Card ID #:			GPS & SD Card ID #:			GPS Datum: WGS84 (preferred) <input type="checkbox"/> NAD83 <input type="checkbox"/> NAD27 <input type="checkbox"/> Other: _____		
General Location or Shoreline Segment:					If applicable, fill out Shoreline Search Information on reverse.			
INDIVIDUAL CARCASS LOG								
Carcass ID #	Latitude (decimal degrees)	Longitude (decimal degrees)	Species	Condition FRESH, DEG, MUM	Oiling NO, LT, MOD, HV, UNK	Photo #	Comments	
01								
02								
03								
04								
05								
06								
07								
08								
09								
10								
For this batch, record white Carcass Chain of Custody Tag pre-printed Batch Tag No. _____ and Total number of carcasses: _____ Fold completed form and put inside a resealable waterproof storage bag (e.g., Ziploc®), then place inside the large plastic carcass batch bag.								

INSTRUCTIONS: Carcass Collection Form (or follow incident-specific protocols if available)

Incident Name and Date: Fill out.	ICS Position: ICS position of Carcass Collection Team, if applicable. Record other identifier if no ICS position.	Carcass Collector: Record information <i>for</i> designated Carcass Collector, who serves as Collection Team Leader.
Data Recorder: Record information <i>for</i> the person filling out this form.	Permits and Authorizations: Ask your supervisor. If permits have not been obtained, you are not authorized to collect carcasses, although you can take photos and document their location.	
Camera/GPS & SD Card IDs: Write ID numbers of assigned camera and GPS unit and the SD (memory cards). DO NOT USE YOUR PERSONAL PHONE OR CAMERA.		GPS Datum: Check one (found in GPS settings). WGS84 is preferred.
Location: Name of general location as shown on navigational charts or maps, and (if applicable) name or number of assigned shoreline segment.		
Carcass ID #: When filling out yellow Individual Carcass ID Tag, this is the number (1-10) to record for "Carcass ID #".	Latitude and Longitude: Decimal Degrees preferred. Regardless of format, include any decimals or symbols for degrees/minutes/seconds. If no GPS unit is available, describe the location where carcass was found.	Species: Record the species as precisely as you can. For example, you might ID a gull as "mew gull" (to species), or as "unidentified gull" or "bird."
Condition: 'FRESH' = freshly dead. Eyeballs are plump and intact, body is whole with no evidence of insect/crustacean intrusion or other scavenging. 'DEG' = degraded body condition, with one or more of the following: eyeballs sunken or gone; body decomposing or being eaten by insects/crustaceans/other animals; exposed flesh does not appear completely dried out; or some body parts are missing. 'MUM' = mummified. Only skin, bones, or feathers remain, or exposed flesh appears completely dried out.		Oiling: NO = no obvious oil on body. LT = light spots of oil. MOD = patches over more of the body than LT. HV = heavily oiled, over most of the body. UNK = unknown.
Photo #: Digital photo # from SD card, or # written on whiteboard and photographed with carcass. A large number of similar carcasses can be photographed as a group.		Comments: Please note any additional information that you think might be useful.
Carcass Chain of Custody (COC) BatchTag No: Write pre-printed Batch Tag No. from white Carcass COC Tag, & total number of carcasses for this batch (1-10).		

SHORELINE SEARCH INFORMATION (complete this section only if following protocol for SHORELINE SEARCHES)		
Date:	Location and Shoreline Segment:	Carcass Collector Name:
Start / Stop Times: /	Start / Stop GPS Coordinates (decimal degrees): /	
Wind is Toward: Water <input type="checkbox"/> Land <input type="checkbox"/> Along Beach <input type="checkbox"/> No wind <input type="checkbox"/>		Search Platform: Walking <input type="checkbox"/> Boat <input type="checkbox"/> Vehicle <input type="checkbox"/> Aircraft <input type="checkbox"/> Other <input type="checkbox"/>
Dominant Shoreline Type: Sand <input type="checkbox"/> Pebble <input type="checkbox"/> Cobble <input type="checkbox"/> Boulder <input type="checkbox"/> Bedrock <input type="checkbox"/> Vertical Cliff <input type="checkbox"/> Marsh <input type="checkbox"/> Sand/Mud Flat <input type="checkbox"/> Other <input type="checkbox"/>		
Beach Width Searched (feet): _____ Search Path: Single Path <input type="checkbox"/> Out-and-back <input type="checkbox"/>		
Comments:		

Carcass Collection Form - Version 12/2019 (back page)

Figure 9-4: Individual Carcass Identification Tag (pre-printed or water-resistant two-sided blank); one per carcass.

INDIVIDUAL CARCASS IDENTIFICATION TAG

CARCASS CHAIN OF CUSTODY (CoC) TAG #	CARCASS ID #	DATE (MM/DD/YYYY)
LOCATION (Lat/Long)		COLLECTION TEAM LEADER (Printed Name)

TAG INSTRUCTIONS

This system works best when you complete the *Individual Carcass Identification Tag*, the *Carcass CoC Tag* and the *Carcass Collection Form* **at the same time**.

CoC Tag #: Enter the pre-printed number from the *Carcass CoC Tag* for the batch-bag this carcass will be placed into.

Carcass ID #: Assign a sequential number to each carcass to be placed within a batch-bag (Ex: 01, 02, 03, 04, etc). This number will match the Carcass ID number on the *Carcass Collection Form* for this batch.

Figure 9-5: Carcass Chain of Custody (CoC) Tag (pre-printed or water-resistant two-sided blank); one per batch of carcasses.

CARCASS CHAIN OF CUSTODY TAG

COLLECTION DATE: <small>(MM/DD/YYYY)</small>	BATCH TAG NO. <div style="font-size: 24pt; font-weight: bold; text-align: center;">1060</div>
COLLECTION TEAM NAME:	
LOCATION DESCRIPTION:	
LIST OF EACH CARCASS IN THIS BATCH BY INDIVIDUAL CARCASS ID #:	
Empty space for listing carcasses	
NAME OF COLLECTION TEAM LEADER:	
COMPLETE CHAIN OF CUSTODY ON REVERSE SIDE	

CHAIN OF CUSTODY: Complete a "From" and "To" section each time the Batch changes possession.

From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date
From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date
From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date
From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date
From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date

Figure 9-6: Carcass Intermediate Transporters Log (two pages).

Transport Log for CARCASSES Form stays with Transport Team		Incident Name:			
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TRANSPORT TEAM INFORMATION		
Transportation Name or Call Sign:	ICS Position <i>Group, Task Force, Strike Team:</i>	Data Recorder <i>Name & Employer (Phone & Email, if there is no ICS position):</i>
<i>Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/></i>		

LOG INFORMATION					
Batch Tag Number <i>Found on Carcass Chain of Custody Tag</i>	Species or Species Group (bird, sea otter, seal, etc.)	Transporter Received the Carcass(es) FROM: <i>Name of the signatory (From/Release) on the Carcass Chain of Custody Tag. Include Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>	Transporter Gave the Carcass(es) TO: <i>Name of the signatory (To/Receipt) on the Carcass Chain of Custody Tag. Include Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>

Batch Tag Number <i>Found on Carcass Chain of Custody Tag</i>	Species or Species Group (bird, sea otter, seal, etc.)	Transporter Received the Carcass(es) <u>FROM</u> : <i>Name of the signatory (From/Release) on the Carcass Chain of Custody Tag, Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>	Transporter Gave the Carcass(es) <u>TO</u> : <i>Name of the signatory (To/Receipt) on the Carcass Chain of Custody Tag, Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>

INSTRUCTIONS: Transport Log for CARCASSES

This form is the primary record maintained by each transport boat/vehicle/aircraft to track each carcass or batch of carcasses transported by this team. The original form stays with the boat/vehicle/aircraft; copies will be requested by officials within the Incident Management Team. This information is important to record both to document each boat/vehicle/aircraft's transport activity and as a backup in case the Carcass Chain of Custody Tag is lost or damaged. Information should be recorded in this log for each carcass or batch of carcasses transported AND each transporter must complete and sign the Carcass Chain of Custody Tag when accepting or transferring carcasses.

Incident Name: Incident-specific assigned number or incident assigned name.	
TRANSPORT TEAM INFORMATION	
Transportation Name or Call Sign: Record boat/vehicle/aircraft name or identifying number. Transport Type: Check appropriate box.	ICS Position: ICS position of the transport boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1).
Data Recorder: Record information for the person filling out this form.	
LOG INFORMATION	
Batch Tag Number: Pre-printed number on the Carcass Chain of Custody Tag.	Species: Find this information on the Carcass Collection Form or ask the Carcass Collection Team.
Transporter Received the Carcass(es) <u>FROM</u>: Write the name of the signatory (From/Release) on the Carcass Chain of Custody Tag, their transportation name or call sign, and their affiliation or ICS position. Date/Time that the carcass was received. Include AM or PM.	Transporter Gave the Carcass(es) <u>TO</u>: Write the name of the signatory (To/Receipt) on the Carcass Chain of Custody Tag, their transportation name or call sign, and their affiliation or ICS position. Date/Time that the carcass was transferred to the noted person. Include AM or PM.
THIS FORM STAYS WITH THE TRANSPORT TEAM.	

Transport Log for CARCASSES – Version 12/2019 (back page)

9740.3.3 – Wildlife Capture Forms

This section contains live animal capture and transport forms, and a version suitable for printing is available at the ADEC [Area Plan References and Tools](#) web page. Please check this website for the most recent versions.

- Figure 9-7: Live Animal Capture Form (two pages, one sheet of paper, print in landscape orientation).
- Figure 9-8: Capture Log for LIVE Animals (two pages, one sheet of paper, print in landscape orientation).
- Figure 9-9: Transport Log for LIVE Animals (two pages, one sheet of paper, print in landscape orientation).

These forms are provided for personnel who have been trained in live animal capture and transport. Training is provided by some OSRO/PRACs and can also be provided by resource agencies upon request.

Figure 9-7: Live Animal Capture Form (two pages).

DRAFT

LIVE Animal Capture Form Form stays with Animal	Species Captured? BIRD <input type="checkbox"/> SEA OTTER <input type="checkbox"/> OTHER <input type="checkbox"/> : _____	Incident Name: _____
	Animal Number: _____	

Rehab Facility Use Only

CAPTURE TEAM INFORMATION		
Transportation Name or Call Sign: Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/>	ICS Position Group, Task Force, Strike Team: _____	Data Recorder Name & Employer (Phone & Email, if there is no ICS position): _____
Lead Animal Handler Name & Employer (Phone & Email, if there is no ICS position): _____		Assistant Animal Handler Name & Employer: _____

CAPTURE INFORMATION			
Date: MM/DD/YYYY	Time: _____ AM PM	Location Name: _____	GPS Datum: WGS84 <input type="checkbox"/> NAD83 <input type="checkbox"/> NAD27 <input type="checkbox"/>
		Longitude: _____	Latitude: _____
Animal Location PRIOR to Capture: ON LAND <input type="checkbox"/> IN WATER <input type="checkbox"/>		Animal Behavior PRIOR to Capture: SWIMMING <input type="checkbox"/> ; RUNNING <input type="checkbox"/> ; FLYING <input type="checkbox"/> ; STILL/LETHARGIC <input type="checkbox"/> ; FEEDING <input type="checkbox"/> ; PREENING/GROOMING <input type="checkbox"/> ; WITH PUP/CHICK <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain: _____	
Capture Method: DIP NET <input type="checkbox"/> TANGLE NET <input type="checkbox"/> MIST NET <input type="checkbox"/> OTHER <input type="checkbox"/> Explain: _____		Reason for Capture: OILED ___% <input type="checkbox"/> ; INJURED <input type="checkbox"/> ; LONE PUP/CHICK <input type="checkbox"/> ; PRE-EMPTIVE <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain: _____	Pursuit Duration Minutes: _____
Animal Reference Number: _____	Notes: _____		

ANIMAL DESCRIPTION		
Age: ADULT <input type="checkbox"/> PUP/CHICK <input type="checkbox"/> MOM & PUP/CHICK <input type="checkbox"/>	Sex: MALE <input type="checkbox"/> FEMALE <input type="checkbox"/> UNK <input type="checkbox"/>	Disposition AFTER Capture: TRANSFERRED <input type="checkbox"/> DIED <input type="checkbox"/> ESCAPED <input type="checkbox"/> RELEASED <input type="checkbox"/> If released, explain in notes below.
Animal Behavior AFTER Capture: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain: _____		
Animal Care Provided in Field: _____		Notes: _____

ANIMAL TRANSFER – FIELD CHAIN OF CUSTODY			
Date: MM/DD/YYYY	Time: _____ AM PM	Animal Behavior AT TIME OF TRANSFER: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; DEAD <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain: _____	
Transfer to: BOAT <input type="checkbox"/> HELO <input type="checkbox"/> VEHICLE <input type="checkbox"/> STABILIZATION <input type="checkbox"/> REHAB <input type="checkbox"/>		Captor's Printed Name: _____	Signature: _____
Receiver's Printed Name: _____		Signature: _____	Affiliation: _____
_____ / _____			
Date: MM/DD/YYYY	Time: _____ AM PM	Animal Behavior AT TIME OF TRANSFER: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; DEAD <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain: _____	
Transfer to: BOAT <input type="checkbox"/> HELO <input type="checkbox"/> VEHICLE <input type="checkbox"/> STABILIZATION <input type="checkbox"/> REHAB <input type="checkbox"/>		Transferor's Printed Name: _____	Signature: _____
Receiver's Printed Name: _____		Signature: _____	Affiliation: _____
_____ / _____			

ANIMAL TRANSFER – FIELD CHAIN OF CUSTODY CONTINUED			
Date: MM/DD/YYYY	Time: AM PM	Animal Behavior AT TIME OF TRANSFER: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; DEAD <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain:	
Transfer to: BOAT <input type="checkbox"/> HELO <input type="checkbox"/> VEHICLE <input type="checkbox"/> STABILIZATION <input type="checkbox"/> REHAB <input type="checkbox"/>		Transferor's Printed Name:	Signature:
Receiver's Printed Name:		Signature:	Affiliation:
/ /			
Date: MM/DD/YYYY	Time: AM PM	Animal Behavior AT TIME OF TRANSFER: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; DEAD <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain:	
Transfer to: BOAT <input type="checkbox"/> HELO <input type="checkbox"/> VEHICLE <input type="checkbox"/> STABILIZATION <input type="checkbox"/> REHAB <input type="checkbox"/>		Transferor's Printed Name:	Signature:
Receiver's Printed Name:		Signature:	Affiliation:
/ /			
Date: MM/DD/YYYY	Time: AM PM	Animal Behavior AT TIME OF TRANSFER: STILL/LETHARGIC <input type="checkbox"/> ; ALERT/ACTIVE <input type="checkbox"/> ; AGGRESSIVE <input type="checkbox"/> ; GROOMING/PREENING <input type="checkbox"/> ; DEAD <input type="checkbox"/> ; OTHER <input type="checkbox"/> Explain:	
Transfer to: BOAT <input type="checkbox"/> HELO <input type="checkbox"/> VEHICLE <input type="checkbox"/> STABILIZATION <input type="checkbox"/> REHAB <input type="checkbox"/>		Transferor's Printed Name:	Signature:
Receiver's Printed Name:		Signature:	Affiliation:
/ /			

INSTRUCTIONS: LIVE Animal Capture Form

Species Captured?: Check one. If OTHER, record the species/species group.		Incident Name: Incident-specific assigned number or incident assigned name.	
CAPTURE TEAM INFORMATION			
Transportation Name or Call Sign: Record boat/vehicle/aircraft name or identifying number. Transport Type: Check one.		ICS Position: ICS position of the capture boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1).	
Data Recorder: Record information for person filling out this form.	Lead Animal Handler: Record information for person who is the Lead Animal Handler (person with the most training and/or experience).		Assistant Animal Handler: Record information for person assisting the Lead Animal Handler.
CAPTURE INFORMATION			
Date: Date of Capture	Time: Time of Capture. Circle AM or PM.	Location Name: Place name where the otter was caught (Ex: Growler Bay) LAT/LONG: GPS point for the capture location. Decimal Degree format preferred.	GPS Datum: Check one (found in GPS settings). WGS84 preferred.
Animal Location Prior to Capture: Check one.		Animal Behavior Prior to Capture: Check one or more as appropriate. If OTHER, explain.	
Capture Method: Check one. If OTHER, explain.	Reason for Capture: Check one. If oiled, estimate percentage of external oiling. If OTHER, explain (i.e., if injured, describe the injury).		Pursuit Duration: Amount of time (in minutes) from beginning of stalk until the animal is safely in a pet carrier.
Animal Reference Number: Sequential number assigned by the capture boat/vehicle/aircraft to each animal. Typically, the first three letters of the boat/vehicle/vessel name followed by sequential numbers (Ex: KIT 001, KIT 002, etc.)			Notes/ Explain Sections: Add information as deemed necessary and appropriate.
ANIMAL DESCRIPTION			
Age and Sex: Record, if known.		Disposition After Capture: Check as appropriate. If the animal was released, explain why in the notes section.	
Animal Behavior After Capture: Check one or more as appropriate. If OTHER, explain.		Animal Care Provided in Field: Briefly describe any care or treatment administered in the field or during transit.	Notes/ Explain Sections: Add information as deemed necessary and appropriate.
ANIMAL TRANSFER – FIELD CHAIN OF CUSTODY			
Date: Date of Transfer	Time: Time of Transfer. Circle AM or PM.	Animal Behavior at Time of Transfer: Check one or more as appropriate. If OTHER, explain.	Transfer to: Check one. Note: "STABILIZATION" and "REHAB" transfers may occur at pre-designated drop-off locations.
Captor's/Transferor's Name/Signature: Print and sign name.		Receiver's Name/Signature/Affiliation: Print and sign name. Provide affiliation or transportation name.	

LIVE Animal Capture Form – Version 12/2019 (back page)

Figure 9-8: Capture Log for LIVE Animals (two pages).

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Capture Log for LIVE Animals Form stays with Capture Team	Incident Name:
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CAPTURE TEAM INFORMATION		
Transportation Name or Call Sign: <i>Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/></i>	ICS Position <i>Group, Task Force, Strike Team:</i>	Data Recorder <i>Name & Employer (Phone & Email, if there is no ICS position):</i>
Lead Animal Handler <i>Name & Employer (Phone & Email, if there is no ICS position):</i>		Assistant Animal Handler <i>Name & Employer:</i>

LOG INFORMATION						
Animal Reference Number <i>Located on LIVE Animal Capture Form</i>	Species or Species Group (bird, sea otter, seal, etc.)	CAPTURE DATE/TIME <i>(MM/DD/YYYY)</i>	Capture LOCATION: <i>Place Name and Latitude/Longitude where the animal was captured</i>	DISPOSITION <i>At Time of Transfer</i> D = Died E = Escaped R = Released T = Transferred	Capture Team Gave the Animal <u>TO</u> : <i>Name of the signatory (Receiver) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position, and any relevant notes to assist rehabilitators</i>	TRANSFER DATE/TIME <i>(MM/DD/YYYY)</i>

Animal Reference Number <i>Located on LIVE Animal Capture Form</i>	Species or Species Group (bird, sea otter, seal, etc.)	CAPTURE DATE/TIME <i>(MM/DD/YYYY)</i>	Capture LOCATION: <i>Place Name and Latitude/Longitude where the animal was captured:</i>	DISPOSITION <i>At Time of Transfer</i> D = Died E = Escaped R = Released T = Transferred	Capture Team Gave the Animal TO: <i>Name of the signatory (Receiver) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position, and any relevant notes to assist rehabilitators</i>	TRANSFER DATE/TIME <i>(MM/DD/YYYY)</i>

INSTRUCTIONS: Capture Log for LIVE Animals

This form is the primary record maintained by each capture boat/vehicle/aircraft to track each live animal captured by this team. The original form stays with the boat/vehicle/aircraft; copies will be requested by officials within the Incident Management Team. This information is important to record both to document each team's capture activity and as a backup in case individual LIVE Animal Capture Forms are lost. Information should be recorded in this log for each animal captured and transported. All live animals must be accompanied by a separate LIVE Animal Capture Form, which stays with the animal until it reaches a rehabilitation facility.

Incident Name: Incident-specific assigned number or incident assigned name.		
CAPTURE TEAM INFORMATION		
Transportation Name or Call Sign: Record boat/vehicle/aircraft name or identifying number. Transport Type: Check appropriate box.		ICS Position: ICS position of the capture boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: <i>Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1</i>).
Data Recorder: Record information for the person filling out this form.	Lead Animal Handler: Record information for the person who is the Lead Animal Handler (person with the most training and/or experience).	Assistant Animal Handler: Record information for person assisting the Lead Animal Handler.
ANIMAL INFORMATION		
Animal Reference Number: Sequential number assigned by the capture team to each live animal. The number can be found on the LIVE Animal Capture Form.		
Capture Date: MM/DD/YYYY (Ex: <i>06/05/2010</i>) Time: Record the time; include AM or PM.		
Capture Location Name: Place name where the animal was caught (Ex: <i>Growler Bay</i>)		
LAT/LONG: GPS point for the capture location in decimal degrees. (Information should be the same as on LIVE Animal Capture Form.)		
Capture Team Gave the Animal TO: Log the name of the signatory (Receiver) on the LIVE Animal Capture Form, their Transportation Name or Call Sign, and their Affiliation or ICS Position. Write the Date/Time that the Animal was given to the noted person. Include AM or PM.		
Note: Add any information that may assist rehabilitators in evaluating and treating the animal. Use space below entry as needed.		

Figure 9-9: Transport Log for LIVE Animals (two pages).

DRAFT

Transport Log for LIVE Animals Form stays with Transport Team	Incident Name:
---	----------------

TRANSPORT TEAM INFORMATION		
Transportation Name or Call Sign: Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/>	ICS Position <i>Group, Task Force, Strike Team:</i>	Data Recorder <i>Name & Employer (Phone & Email, if there is no ICS position):</i>

LOG INFORMATION					
Animal Reference Number <i>Located on LIVE Animal Capture Form</i>	Species or Species Group (bird, sea otter, seal, etc.)	Transporter Received the Live Animal FROM: <i>Name of the signatory (Captor or Transferor) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>	Transporter Gave the Live Animal TO: <i>Name of the signatory (Receiver) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position</i>	DATE/TIME <i>(MM/DD/YYYY)</i>

Animal Reference Number <i>Located on LIVE Animal Capture Form</i>	Species or Species Group (bird, sea otter, seal, etc.)	Transporter Received the Live Animal FROM: <i>Name of the signatory (Captor or Transferor) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position:</i>	DATE/TIME <i>(MM/DD/YYYY)</i>	Transporter Gave the Live Animal TO: <i>Name of the signatory (Receiver) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position:</i>	DATE/TIME <i>(MM/DD/YYYY)</i>

INSTRUCTIONS: Transport Log for LIVE Animals

This form is the primary record maintained by each transport boat/vehicle/aircraft to track each live animal transferred by this team. The original form stays with the boat/vehicle/aircraft; copies will be requested by officials within the Incident Management Team. This information is important to record both to document each boat/vehicle/aircraft's transport activity and as a backup in case individual LIVE Animal Capture Forms are lost or damaged. Information should be recorded in this log for each animal transported. All live animals must be accompanied by a separate LIVE Animal Capture Form, which stays with the animal until it reaches a rehabilitation facility, AND must also be signed by each transporter.

Incident Name: Incident-specific assigned number or incident assigned name.	
TRANSPORT TEAM INFORMATION	
Transportation Name or Call Sign: Record boat/vehicle/aircraft name or identifying number. Transport Type: Check appropriate box.	ICS Position: ICS position of the transport boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: <i>Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1</i>).
Data Recorder: Record information for the person filling out this form.	
LOG INFORMATION	
Animal Reference Number: Sequential number assigned by the capture team to each live animal. The number can be found on the LIVE Animal Capture Form.	
Transporter Received the Live Animal FROM: Log the name of the signatory (Captor or Transferor) on the LIVE Animal Capture Form, their Transportation Name or Call Sign, and their Affiliation or ICS Position. Write the Date/Time that the Animal was received. Include AM or PM.	Transporter Gave the Live Animal TO: Log the name of the signatory (Receiver) on the LIVE Animal Capture Form, their Transportation Name or Call Sign, and their Affiliation or ICS Position. Write the Date/Time that the Animal was given to the noted person. Include AM or PM.
NOTE: THIS FORM STAYS WITH THE TRANSPORT TEAM.	

Transport Log for LIVE Animals – Version 12/2019 (back page)

9740.3.4 – Checklist: Vessel Grounding or Sinking Response

1. Preventing Rat Introduction on Alaska’s Rat-Free Islands (see [Section 3630.1](#)):

Does the stricken vessel have rats on board, or has it ever tied up at a port that has rats? (See Figure 9-10 and Table 9-8.)

☐ NO

☐ YES → Is the vessel near a rat-free location, especially in the Alaska Maritime National Wildlife Refuge or the Pribilof Islands (Table 9-9)?

☐ NO

☐ YES → Notify Unified Command
→ Notify Liaison Officer
→ Notify USFWS Oil Spill Coordinator (907-242-6893, fwsakspillresponse@fws.gov)

2. ENTANGLEMENT (see [Section 3630.2](#)):

2.a. Are there nets, lines (including anchor lines), or other gear in the water?

☐ NO

☐ YES → Describe the type, size, and deployment details:

Nets: What type? How large? Are they fully deployed? _____

Lines: How long? Anchor, long-line, baited? _____

Pots: Long-line pots or standard? _____

→ Is the deployed gear attached to the vessel?

☐ NO

☐ YES

2.b. Is there non-deployed gear (out of the water) that could become an entanglement issue if the vessel capsizes or sinks?

☐ NO

☐ YES → Describe as completely as possible: _____

3. DISPOSAL OF ON-BOARD CATCH (see [Section 3630.3](#)):

3.a. Does oiled fish or seafood need to be disposed of?

☐ NO

☐ YES → Notify Unified Command; oil-contaminated catch must be disposed of in a permitted landfill, not in the water.

3.b. Does unhoiled catch need to be disposed of in water because it is spoiled or because it is causing vessel instability?

☐ NO

☐ YES → Notify Unified Command.

→ Consult with NMFS, USFWS, and ADF&G to avoid disposing of catch in a manner that could attract or sicken wildlife.

→ If disposal is proposed in ocean waters, as defined under the Marine Protection, Research, and Sanctuaries Act (MPRSA), 33 U.S.C. 1402(b),¹⁴ contact EPA Alaska Operations Office, (907) 271-5083. Permitting exclusions may apply, depending on disposal location.

→ If disposal is proposed in state waters, verbal or written authorization is required from the ADEC Environmental Health Division.

4. INVASIVE SPECIES OTHER THAN RATS (see [Section 3630.4](#)):

4.a. Is there a potential for other invasive species to be on board (e.g., in ballast water, on hulls, in cargo)?

☐ NO

☐ YES → Consult with NOAA Fisheries, USFWS, and ADF&G on possible exposure pathways and species (see the ADF&G [Invasive Species](#) web page).

5. OTHER IMPACTS (see [Section 3630.5](#)):

5.a. Will the vessel be removed, salvaged, or scuttled?

☐ NO

☐ YES → Notify Unified Command.

→ Contact EPA if scuttling is proposed in MPRSA-defined ocean waters (see the EPA [Disposal of Vessels at Sea](#) web page).

→ Scuttling a vessel may also require USCG and ADEC approval or permits.

→ Consult with NOAA Fisheries, USFWS, and ADF&G for mitigation measures to minimize impacts to wildlife and sensitive habitats.

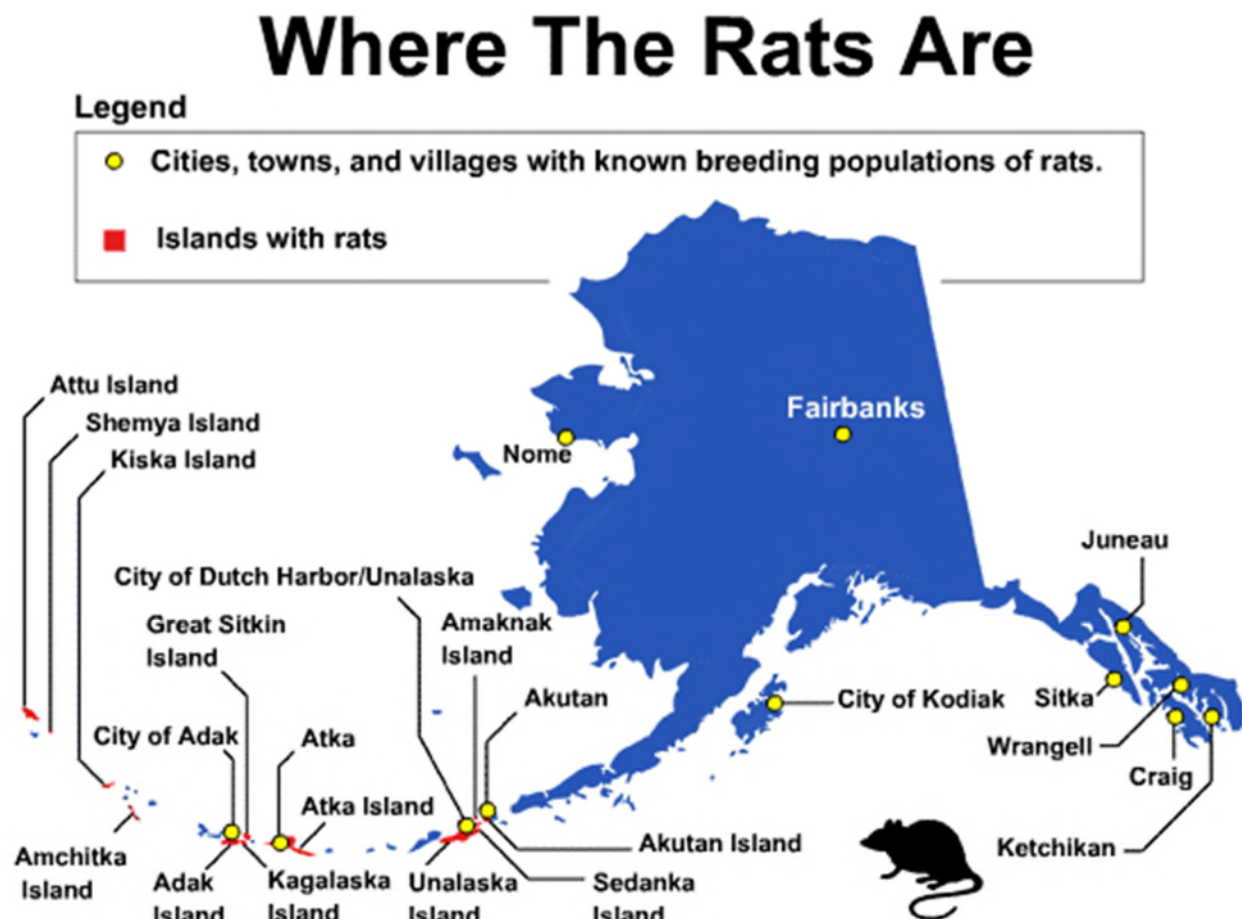
5.b. Is there fish or seafood on board?

☐ NO

☐ YES → Return to Question 3, above.

¹⁴Ocean waters, as defined in the MPRSA, 33 U.S.C. 1402(b). Ocean waters can be viewed on the [Alaska DEC Seafood Processing Webmap](#) by activating the “NOAA Baseline/Baselines Closing Lines” layer.

1 Figure 9-10: Location of Known Breeding Populations of Rats in Alaska.



2 Source: ADF&G [Invasive Species – Norway Rat \(*Rattus norvegicus*\)](#) web page.

3 Table 9-8: Cities, Towns, and Villages in Alaska with Known Breeding Populations of Rats.

City, Town, or Village			
Adak	Craig	Juneau	Nome
Akutan	Dutch Harbor/Unalaska	Ketchikan	Sitka
Atka	Fairbanks	Kodiak	Wrangell

4 Table 9-9: Islands in the Alaska Maritime National Wildlife Refuge (NWR) Known to Have Rats.
5 (All other islands in the Alaska Maritime NWR should be considered to be rat-free.)

Fox Islands	Andreanof Islands	"Rat" Islands	Near Islands
Unalaska	Adak	Kiska	Attu
Amaknak	Great Sitkin	Amchitka	Shemya
Akutan	Kagalaska		
Sedanka	Atka		

9740.3.5 – Rat Prevention Guidelines for Vessels¹⁵

Young rats in search of new territories may hop onto your vessel no matter how clean it is. Under the astonished eyes of biologists, a rat streaked down the Dutch Harbor dock and leapt onto the USFWS's M/V *Tiglax* during the M/V *Selendang Ayu* oil spill. Smelly boats will attract more rats, but no boat is immune. Rats could come aboard with freight, vehicles, and containers on cargo ships and ferries. Rats can cause significant damage to boats left unattended in rat-infested ports through the winter or until the next fishing opener. Keep traps set!

Be Knowledgeable and Ready

- Assume any port in the contiguous U.S. (the “lower 48”) has rats.
- Good sanitation is a key to prevention; keep food and garbage in tightly sealed storage areas to avoid attracting rats.
- Familiarize yourself and your crew with rat sign, such as chewed materials, hair, rub marks, feces, and urine. Periodically search dark and concealed spaces for rat sign.

Run a Rat-free Boat

- When tying up in port, look for ways rats could board your boat, and take steps to stop them. Rats are excellent climbers, jumpers, and swimmers.
- Use rat guards on tie-up lines where appropriate.
- Because rats are nocturnal, night lighting on gangways and ramps can discourage their use by rats.
- Seal entry points to your vessel's interior, such as cable chases, and put screens or louvers over windows and vents.
- Inspect and shake out fishing nets and lines before taking them aboard. Rats like to nest and shelter in trawl and seine nets and coils of groundline. Most gear storage facilities do NOT have rat control programs. Soap does not work to protect stored nets from rat damage.
- Inspect cargo for rat sign. Rats can hide in containers and in pallets.

Kill Rats that Get Aboard

- Learn more about rat identification and environmental impacts from rats on the ADF&G [Invasive Species — Norway Rat \(*Rattus norvegicus*\)](#) web page.
- When tied up in rat-infested ports, deploy traps or poison bait stations near any possible spot a rat could board.
- Use multiple approaches. Deploy snap traps, sticky boards, and poison. Put traps where rat sign is found, in dark and concealed spaces, and near food or garbage.
- Use fresh bait and be patient. Rats are wary of new items in their environment and often will not take bait for days or even weeks after it is introduced.
- If you catch one rat, do not assume it is the only one. Re-deploy traps.
- As a last resort you may need to have the vessel fumigated.
- Never throw a live rat overboard. They are strong swimmers and may reach land.

¹⁵Adapted from information available on the [StopRats.org](#) web page.

1 Speak Up and Spread the Word

- 2 • Tell the harbormasters in the ports you patronize that you expect effective rat prevention as
- 3 part of the service you pay for.
- 4 • Report rat sightings, and especially a rat invasion of your boat, to the harbormaster.
- 5 • Ask about rat control where you store your gear.
- 6 • Spread the word to the fleet.

DRAFT

1 *9740.3.6 – Initiation and Close-Out Forms for ESA Section 7 Consultation*

2 Template forms used by the USCG, NMFS, and the USFWS in Alaska for initiating and concluding the
3 emergency ESA section 7 consultation for incident response actions follow.
4

5 Word and fillable .pdf versions of these forms can be found on the ADEC [Area Plan References and Tools](#)
6 web page. Please check this website for the most recent versions.
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Figure 9-11: Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7 Consultation Initiation Form.

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

This form is intended to initiate and document emergency consultation with the National Marine Fisheries Service and U.S. Fish & Wildlife Service (the Services) for species listed, and critical habitat designated under, the Federal Endangered Species Act (ESA). This form is intended to streamline and standardize initiation of the ESA consultation process, when emergency spill response activities may affect federally listed species and/or critical habitat. This form is not intended to alter any provisions of the Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities signed by six federal agencies in 2001.¹

Emergency Contact: The Services should be contacted as soon as possible by telephone and Email at:

U.S. Fish & Wildlife Service	fwsakspillresponse@fws.gov	Cell: 907-242-6893	Alt: 907-750-8527
National Marine Fisheries Service	sadie.wright@noaa.gov	Off: 907-586-7630	Cell: 907-957-8147

The initial stages of emergency consultations can be done by phone, but must be followed as soon as possible by written correspondence; therefore, this form will be completed no later than 24 hours following notification of the emergency and transmitted via email regarding emergency spill response actions.

Instructions for Completing the Form

Pages 2-4: The Federal On-Scene Coordinator (FOSC) or FOSC Representative for ESA consultation, with assistance from the NOAA Scientific Support Coordinator (SSC), should fill out pages 2-4. All proposed initial response actions should be indicated, including any pre-approved practices to avoid or minimize impacts to listed species and critical habitats.

Pages 5-9: The Services will assist in determining the presence of ESA protected resources in the response area, but the initial checklist should be prepared by the FOSC (or designee). The Services will complete the initial effects assessment, considering the response actions and standard practices proposed. The Services may require additional information regarding proposed response actions and techniques when conducting this assessment. The Services will review the FOSC's determination of whether or not the proposed response tactics and actions will likely affect any listed species or critical habitat, check the appropriate and applicable mitigation measures, and provide recommendations to avoid and minimize any potentially adverse effects. The Services will strive to transmit the completed form to the FOSC within 24 hours of receipt.

Awaiting a response from the Services should not delay emergency response activities.

The FOSC will implement as many mitigation measures, recommendations and conservation measures as feasible without delaying the response. The Services must be notified if actions and techniques change at the response progresses and will be available for further coordination and consultation as requested.

Post Emergency

Once the emergency response actions are completed, the Services will be notified and the Federal OSC and the Service(s) will jointly review and evaluate the effects of response activities on listed species and/or critical habitat, using the post response consultation close-out form. If the response resulted in adverse effects, formal consultation will be initiated. If no adverse effects occurred, ESA consultation is complete.

¹ Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act. 2001.

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

TIME & DATE OF TRANSMITTAL:

FROM: FOSC U.S. Coast Guard	NAME: EMAIL:	off: cell:
TO: USFWS <input type="checkbox"/>	NAME: U.S. Fish and Wildlife Service EMAIL: fwsakspillresponse@fws.gov	cell: (907) 272-6893 alt: (907) 750-8527
NMFS <input type="checkbox"/>	NAME: Sadie Wright EMAIL: sadie.wright@noaa.gov	off: (907) 586-7630 cell: (907) 957-8147

INCIDENT NAME:

DATE OF INCIDENT:

LOCATION INFORMATION:

CENTER LOCATION (NAD 83)	LATITUDE:	LONGITUDE:
---------------------------------	------------------	-------------------

LOCATION TYPE	CHECK ALL THAT APPLY	NAME/LANDMARKS
Port/Industrial	<input type="checkbox"/>	
Riverine/Wetland	<input type="checkbox"/>	
Inshore/Estuarine	<input type="checkbox"/>	
Nearshore/Coastal	<input type="checkbox"/>	
Offshore/EEZ	<input type="checkbox"/>	

DESCRIPTION OF INCIDENT: Be as complete as possible. Include information on the type and amount of material spilled, initial impacts, and other relevant details.

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

Response Actions (Check All That Apply)

ACTIONS/TACTICS ²	Check	Date	DETAILS/NOTES
Common Response Actions			
Boom			
Sorbents/Snares			
Skimming/vacuuming			
Barriers/Berms/Fences			
Trenching			
Flooding/Flushing			
Oiled Vegetation Removal			
Debris Removal (oiled & unoled)			
Sediment Removal/Mixing			
Vessel/Container Removal			
Explosives			
Subpart J Countermeasures			
Dispersants			
In Situ Burn			
Solidifiers			
Surface Washing Agents			
Wildlife Response Tactics			
Carcass Collection			
Wildlife Hazing			
Pre-emptive Capture			
Wildlife Capture/Rehab			
Other Options for Consideration			

² As response (actions/tactics) changes, re-evaluation of the consultation is required.

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

Pre-Identified GRS, POR, and PS Sites³

TYPE	LOCATION(S) SITE IDENTIFIER	REFERENCE FOR PRE-APPROVAL (ACP, Sec. 7, etc.)
<i>Example: GRS</i>	<i>Northeast Prince William Sound PWS NE-27 Granite Cove</i>	<i>Prince William Sound Subarea Contingency Plan</i>

³GRS = Geographic Response Strategy, POR = Place of Refuge, PS = Priority Protection Site

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

Protected Species Checklist⁴

SPECIES ⁵ IN RESPONSE AREA	Critical Habitat in Response Area ⁶	Response Likely to Adversely Affect ⁷	Response Not Likely to Adversely Affect
Birds			
Short-tailed albatross (STAL)			
Steller's eider (STEI)			
Spectacled eider (SPEI)			
Mammals			
Steller sea lion (STSL) (Western AK)			
Bowhead whale (BOWH)			
Cook Inlet beluga whale (CIBW)			
Ringed seal (RISE)			
Bearded seal (BESE)			
Fin whale (FIWH)			
Humpback whale (HUWH)			
Sperm whale (SPWH)			
Blue whale (BLWH)			
North Pacific right whale (NPRW)			
Sei whale (SEWH)			
Sea otter (SEOT) (Southwest AK)			
Polar bear (POBE)			
Other			

⁴ This table focuses on federally listed threatened or endangered species in coastal, estuarine, and inland areas that may be susceptible to oil spills, but does not identify all federally listed species that could be affected. Other federally listed species not listed in this table should be identified appropriately in rows listed under 'Other'.

⁵ Under the Endangered Species Act of 1973, as amended, the National Marine Fisheries Service (NMFS) is responsible for listed marine mammals other than sea otter, polar bear, and walrus; the U.S. Fish and Wildlife Service (FWS) is responsible for listed migratory birds, sea otter, polar bear, and walrus.

⁶ U.S. Fish & Wildlife Service, Region 7, Alaska critical habitat metadata can be found on USFWS ECOS Critical Habitat Portal page at: <http://ecos.fws.gov/crithab/>

⁷ A "Likely to adversely affect" indication is a preliminary estimate based on available information, and is subject to change as more information is received by the Services.

**ALASKA REGION SPILL RESPONSE
EMERGENCY ENDANGERED SPECIES ACT
CONSULTATION INITIATION**

Check all that apply		Implemented Y/N
ESA Protection Measures⁸		
Wildlife Observers		
<input type="checkbox"/>	Deploy Wildlife Observers ⁹ to monitor vessels and aircraft (flying below 1,500 feet over marine waters or shoreline) involved in response. Observers expected to notify vessel captains/pilots about marine mammals to minimize impacts, and record sightings.	
<input type="checkbox"/>	All responders and wildlife observers shall report all sightings of healthy, oiled, or injured wildlife in or near the response area in real time to Wildlife Branch or Environmental Unit.	
Collision Risk & Avoidance		
<input type="checkbox"/>	Response vessel operators shall avoid close approach (<300-500 feet) to whales and pinnipeds in the water.	
<input type="checkbox"/>	Vessel speeds shall be reduced to <13 knots when marine mammals sighted within 1,000 feet.	
<input type="checkbox"/>	Implement vessel and aircraft no-entry buffer zones of 1,500 feet around known or observed marine mammal concentration areas, including seal and sea lion haulouts and rookeries, and migration pathways.	
Acoustic Disturbance/Noise		
<input type="checkbox"/>	Avoid revving engines or other loud in-water activities exceeding 180 decibels in the marine environment. Use quieter equipment when possible (e.g., use 4-stroke instead of 2-stroke boat motors).	
Shoreside Activities (Harassment and Habitat Modification)		
<input type="checkbox"/>	Implement 1,500 foot no-entry buffers around known or observed haulouts or rookeries to prevent shoreside responders from chasing animals into the water.	
<input type="checkbox"/>	Notify all shoreside responders to look for and avoid disturbing (1,500 foot buffer) hauled out pinnipeds.	
Dispersant Use		
<input type="checkbox"/>	Wildlife observers will be on all aircraft and vessels associated with dispersant application to ensure dispersant is not deployed on or near wildlife (Dispersant Use Plan states that dispersants will not be applied within 500m of marine mammals).	
<input type="checkbox"/>	Limit the total amount of dispersant used in a single incident to minimize the risk to pelagic species and their prey.	
<input type="checkbox"/>	Implement buffer zones around area of high wildlife concentrations (e.g., haulouts or rookeries) to minimize exposure.	
In-Situ Burns		
<input type="checkbox"/>	Avoid burns near wildlife concentration areas (e.g., pinniped haulouts or whale migratory routes) when large numbers of wildlife are observed or expected to be present, unless wind conditions are expected to direct the smoke plume away from the area of concern.	
<input type="checkbox"/>	Wildlife observers will be present to locate species of concern near a proposed burn site, and monitor throughout the activity to ensure that no wildlife approaches or becomes entrained in the fire booming. All wildlife will be reported to the Wildlife Branch or Environmental Unit.	

⁸ **Mitigation Measures, Reasonable & Prudent Measures, Terms & Conditions, and Conservation Recommendations.**

Incident-specific mitigation measures are provided to the Unified Command by NMFS (through the emergency ESA section 7 consultation) to minimize the impact of oil spill response activities to species under NMFS's authority, including all of the ESA-species considered in the Unified Plan consultation.

The RPMs included, along with their implementing terms and conditions, are designed to minimize the impact of incidental take that might otherwise result from the proposed action. NMFS concludes that the RPMs are necessary and appropriate to minimize or to monitor the incidental take of bowhead whales, humpback whales, Cook Inlet beluga whales, western DPS Steller sea lions, ringed seals, bearded seals, and salmon resulting from the proposed action.

⁹ Sometimes referred to as "Protected Species Observers".

REQUIRED ESA PROTECTION MEASURES		Implemented Y/N
Reduce probability of exposure		
X	Train and educate. Ensure all USCG and EPA field deployed response personnel, involved with spill response in a manner which may result in incidental take, are given the information needed to enable them to properly assess and protect potentially affected listed species.	
X	The USCG and EPA shall, within their level of discretion and contracting limitations, include as part of any contractual agreement with third parties involved in spill response in a manner which may result in incidental take, terms requiring compliance with Mitigation Measures, Reasonable and Prudent Measures and their corresponding Terms and Conditions.	
X	Conduct Tiered Emergency Consultation with NMFS during incidents when it is determined that ESA-listed species under NMFS's jurisdiction may be affected by response activities.	
Implement a monitoring and documentation program		
X	Document effects to listed species, their prey, and habitat used by listed species from the response methods: species affected; habitat area and type; and temporal affects.	

ADDITIONAL IMPLEMENTED ESA PROTECTION MEASURES

Last Revised 04/30/2019

Figure 9-12: Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7 Post-Response Consultation Close-Out Form.

NMFS # _____ USFWS # _____

**ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT
POST-RESPONSE CONSULTATION CLOSE-OUT**

This document is intended to complete emergency consultation with the National Marine Fisheries Service and U.S. Fish & Wildlife Service (the Services) for species listed, and critical habitat designated under, the Federal Endangered Species Act (ESA). The information provided within is the final step in the request for concurrence that emergency spill response activities undertaken did not adversely affect federally listed species and/or critical habitat. This form is not intended to alter any provisions of the Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities signed by six federal agencies in 2001.¹

This post-response documentation should be completed and submitted to the Service(s) emergency contact as soon as possible after all response activities have been concluded.

Emergency Contact: The Services should be contacted by telephone and Email at:

U.S. Fish & Wildlife Service	fwsakspillresponse@fws.gov	Off: 907-786-3483	Cell: 907-242-6893
National Marine Fisheries Service	sadie.wright@noaa.gov	Off: 907-586-7630	Cell: 907-957-8147

The Federal OSC and the Service(s) will jointly review and evaluate the effects of response activities on listed species and/or critical habitat. If the response resulted in adverse effects, formal consultation will be initiated. If no adverse effects occurred, ESA consultation is complete.

IMPORTANT

This consultation has been issued an Environmental Consultation Organizer identification number (ECO#) by NMFS which will remain open until NMFS consultation is complete.

This consultation has been issued an Environmental Online Conservation System – Tracking and Integrated Logging System (ECOS – TAILS) identification number by USFWS, which will remain open until USFWS consultation is complete.

¹ Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act. 2001.
Last Revised 07/12/2019

NMFS # _____

USFWS # _____

TIME & DATE OF TRANSMITTAL:

FROM: FOSC U.S. Coast Guard	NAME: EMAIL:	off: cell:
TO: USFWS	NAME: EMAIL:	off: cell:
NMFS	NAME: EMAIL:	off: cell:

DESCRIPTION OF RESPONSE: Fill in the information below as completely as possible.

Included: ☐ chart or map showing the location of the incident
☐ photograph of the incident

INCIDENT SUMMARY (Describe the incident, briefly.)

RESPONSE ACTIONS (Provide a brief summary of the actions taken in response to the incident.)

Last Revised 07/12/2019

NMFS # _____

USFWS # _____

RESPONSE TIMELINE (Outline the timeline for all response actions taken in response to the incident.)

MITIGATION MEASURES (Describe all NMFS mitigation measures and recommendations, USFWS recommendations, and when they were incorporated.)

Last Revised 07/12/2019

NMFS # _____

USFWS # _____

CONCLUSION (Based on the information above, provide a determination of affects to Federally Listed Species.)

LESSONS LEARNED (Briefly, discuss lessons learned from this incident response that may be applied to future responses affecting Federally Listed Species.)

SIGNATURE (Include contact information and date.)

Last Revised 07/12/2019

1 *9740.3.7 – Wildlife Response Plans (WRPs)*

2 The following sections contain both the Startup and Comprehensive WRP forms (Sections [9740.3.7.1](#)
3 and [9740.3.7.2](#), respectively). Both WRPs include requests to conduct primary, secondary, and tertiary
4 response strategies. For more information about these forms see [Section 3650](#).

5 Word and fillable .pdf versions of the Startup and Comprehensive WRPs can be found on the ADEC [Area](#)
6 [Plan References and Tools](#) web page. Please check this website for the most recent versions.

7

DRAFT

1 9740.3.7.1 – Startup WRP

2 The Startup WRP (Figure 9-13) is a request to begin the process of authorizing all or some portion of
3 wildlife response strategies to be conducted for up to 72 hours after the start of a spill. For more
4 information about these this form see [Section 3650.1](#).

5 Word and fillable .pdf versions of the Startup WRP can be found on the ADEC [Area Plan References and](#)
6 [Tools](#) web page. Please check this website for the most recent versions.

7

8

DRAFT

Figure 9-13: Startup Wildlife Response Plan (WRP)

I. Incident Summary		
Incident Name:	Date / Time Prepared: /	
Incident Location:	Date / Time at 72 hours after start of spill: /	
Prepared By (print):	Affiliation:	ICS Position:
<input type="checkbox"/> Amendment/Update (all previous versions must be attached)		
Attachments:		
<input type="checkbox"/> Location Map/Sketch (ICS 201) or narrative <input type="checkbox"/> Incident Status Summary (ICS 209) or narrative <input type="checkbox"/> Resources at Risk (ICS 232) <input type="checkbox"/> ESA Section 7 Consultation Documents <input type="checkbox"/> Completed Wildlife Observation Forms <input type="checkbox"/> Other _____	<input type="checkbox"/> Pre-Issued ADF&G Wildlife Response Permits <input type="checkbox"/> Pre-Issued USFWS Permits (attach first page with Permit No.) or Authorizations <input type="checkbox"/> Pre-Issued NMFS Authorizations (attach first page with Authorization No.)	

II. State and Federal On-Scene Coordinator Response to Request	
State On-Scene Coordinator's decision regarding proposed wildlife response activities:	
Time Received:	Date Received:
<input type="checkbox"/> Concur with wildlife agencies. <input type="checkbox"/> Do not concur for the following reason(s):	
Signature:	
Time:	Date:
Federal On-Scene Coordinator's decision regarding proposed wildlife response activities:	
Time Received:	Date Received:
<input type="checkbox"/> Concur with wildlife agencies. <input type="checkbox"/> Do not concur for the following reason(s):	
Signature:	
Time:	Date:

III. Wildlife Agency Response to Request		
Expiration of Startup Wildlife Response Activities (as determined by wildlife agencies):		
Date:	Time:	
ADF&G Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
USFWS Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
NMFS Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:

Acronyms in Startup WRP	
ADF&G = Alaska Department of Fish and Game BIA = Biologically Important Area (https://coast.noaa.gov/digitalcoast/data/biologicallyimportantareas.html) ESA = Endangered Species Act ICS = Incident Command System IMT = Incident Management Team LOA = Letter of Authorization MMHSRP = Marine Mammal Health and Stranding Response Program MMPA = Marine Mammal Protection Act	NMFS = National Marine Fisheries Service OLE = Office of Law Enforcement OSRO = Oil Spill Removal/Recovery Organization PRAC = Primary Response Action Contractor RP/PRP = Responsible Party/Potential Responsible Party UAS = unmanned aerial/aircraft system, "drones" USFWS = U.S. Fish and Wildlife Service WPG = Wildlife Protection Guidelines WRP = Wildlife Response Plan

IV. Request for Startup of Wildlife Response Strategies

This section to be filled out by RP/PRP.

Instructions: All questions must be answered by checking appropriate box or writing in the information where applicable. Check with wildlife agencies if unsure about Species and Habitats. If more space is needed attach a separate Word® document referencing appropriate section and numbers (for example, IV., 1., C.) or reference and include applicable attachments. Fill this out with the best available information. It is understood that conditions may change from the time this form is filled out until the Comprehensive WRP is finalized. Questions are intended to ensure that, once initiated, all aspects of the response strategy will be addressed. Answers may be brief and succinct. Detailed explanations will be required in the Comprehensive WRP.

Species and Habitats	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
Which species groups are known or expected to be in the vicinity of the spill? For each YES, record which species/ species groups (e.g., waterfowl, harbor seal, etc.) and how many are likely present (use actual observations or estimates from reliable resources).	Migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Sea otters <input type="checkbox"/> YES <input type="checkbox"/> NO How many? _____	Whales <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Brown or black bears <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Fish <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____
	Eagles <input type="checkbox"/> YES <input type="checkbox"/> NO How many? _____	Walruses <input type="checkbox"/> YES <input type="checkbox"/> NO How many? _____	Seals <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Ungulates <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Shellfish <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____
	Non-migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Polar bears <input type="checkbox"/> YES <input type="checkbox"/> NO How many? _____	Sea lions <input type="checkbox"/> YES <input type="checkbox"/> NO How many? _____	Furbearers <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____	Invertebrates <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____
			Porpoises <input type="checkbox"/> YES <input type="checkbox"/> NO Which species? _____ How many? _____		

continued on next page

IV. Request for Startup of Wildlife Response Strategies (continued)					
Species and Habitats	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
What ESA-listed species or critical habitat are or may be in the area?					
Where/how close are they to the spill and trajectory?					
Which sensitive life stages or habitats could be affected by the spill or by the response activities?	<input type="checkbox"/> Colonies <input type="checkbox"/> Nests: Incubating or with hatchlings <input type="checkbox"/> Migration or staging area <input type="checkbox"/> Fledglings <input type="checkbox"/> Active eagle nests	<input type="checkbox"/> Haulouts <input type="checkbox"/> Pupping <input type="checkbox"/> Dens	<input type="checkbox"/> Haulouts <input type="checkbox"/> Rookeries <input type="checkbox"/> Lairs <input type="checkbox"/> BIAs	<input type="checkbox"/> Dens <input type="checkbox"/> Insect relief <input type="checkbox"/> Calving or lambing areas	<input type="checkbox"/> Eggs/larvae <input type="checkbox"/> Migration corridor <input type="checkbox"/> Anadromous water body

IV. Request for Startup of Wildlife Response Strategies (continued)					
Primary Response Strategy – <i>Carcass Collection</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
1. <i>Is carcass collection proposed within 72 hours after the start of the spill?</i>	Migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea otters <input type="checkbox"/> YES <input type="checkbox"/> NO	Whales <input type="checkbox"/> YES <input type="checkbox"/> NO	Brown or black bears <input type="checkbox"/> YES <input type="checkbox"/> NO	Fish <input type="checkbox"/> YES <input type="checkbox"/> NO
	Eagles <input type="checkbox"/> YES <input type="checkbox"/> NO	Walruses <input type="checkbox"/> YES <input type="checkbox"/> NO	Seals <input type="checkbox"/> YES <input type="checkbox"/> NO	Ungulates <input type="checkbox"/> YES <input type="checkbox"/> NO	Shellfish <input type="checkbox"/> YES <input type="checkbox"/> NO
	Non-migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Polar bears <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea lions <input type="checkbox"/> YES <input type="checkbox"/> NO	Furbearers <input type="checkbox"/> YES <input type="checkbox"/> NO	Invertebrates <input type="checkbox"/> YES <input type="checkbox"/> NO
			Porpoises <input type="checkbox"/> YES <input type="checkbox"/> NO		
If YES for any species, answer A through H in the Primary Response Strategy section below.					

Secondary Response Strategies – <i>Hazing/Deterrence</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers
2. <i>Is hazing/deterrence proposed within 72 hours after the start of the spill?</i>	Migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea otters <input type="checkbox"/> YES <input type="checkbox"/> NO	Whales <input type="checkbox"/> YES <input type="checkbox"/> NO	Brown or black bears <input type="checkbox"/> YES <input type="checkbox"/> NO
	Eagles <input type="checkbox"/> YES <input type="checkbox"/> NO	Walruses <input type="checkbox"/> YES <input type="checkbox"/> NO	Seals <input type="checkbox"/> YES <input type="checkbox"/> NO	Ungulates <input type="checkbox"/> YES <input type="checkbox"/> NO
	Non-migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Polar bears <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea lions <input type="checkbox"/> YES <input type="checkbox"/> NO	Furbearers <input type="checkbox"/> YES <input type="checkbox"/> NO
	<input type="checkbox"/> PASSIVE ONLY	<input type="checkbox"/> PASSIVE ONLY	Porpoises <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> PASSIVE ONLY	<input type="checkbox"/> PASSIVE ONLY
If YES for any species, answer A through H in the Secondary Response Strategy section below.				

IV. Request for Startup of Wildlife Response Strategies (continued)				
Tertiary Response Strategies – <i>Capture, Transport, Stabilization, Rehabilitation</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers
3. <i>Is capture, transport, stabilization, or rehabilitation proposed within 72 hours after the start of the spill?</i>	Migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea otters <input type="checkbox"/> YES <input type="checkbox"/> NO	Whales <input type="checkbox"/> YES <input type="checkbox"/> NO	Brown or black bears <input type="checkbox"/> YES <input type="checkbox"/> NO
	Eagles <input type="checkbox"/> YES <input type="checkbox"/> NO	Walruses <input type="checkbox"/> YES <input type="checkbox"/> NO	Seals <input type="checkbox"/> YES <input type="checkbox"/> NO	Ungulates <input type="checkbox"/> YES <input type="checkbox"/> NO
	Non-migratory birds <input type="checkbox"/> YES <input type="checkbox"/> NO	Polar bears <input type="checkbox"/> YES <input type="checkbox"/> NO	Sea lions <input type="checkbox"/> YES <input type="checkbox"/> NO	Furbearers <input type="checkbox"/> YES <input type="checkbox"/> NO
			Porpoises <input type="checkbox"/> YES <input type="checkbox"/> NO	
If YES for any species, answer A through J in Tertiary Response Strategies below.				

IV. Request for Startup of Wildlife Response Strategies (continued)					
Primary Response Strategy – <i>Carcass Collection</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
A. Status of permits and authorizations for carcass collection? ➤ If pre-issued, list permit or authorization number.	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued (non-migratory birds only)	<input type="checkbox"/> Requesting	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued
B. Who will collect carcasses (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. ➤ What is their status (on alert/standby, mobilizing, on site and ready, etc.)? ➤ When will they arrive at the field/spill site?					
C. What equipment will be used for carcass collection activities? ➤ When will it arrive at the field/spill site?					
D. How will carcasses be transported from the field to the morgue or staging area and when will transportation be fully operational?					
E. Where will the morgue be established and when will it be operational?					
F. Where will carcasses be refrigerated (for no more than 48 hours) or frozen until morgue is fully operational?					
G. Have you requested (e.g., submitted ICS form 213RR) a wildlife agency representative to be the carcass custodian?					
H. Describe any proposed deviations from the procedures outlined in WPG Tactic Collection of Small Carcasses and Documentation of Large Carcasses .					

IV. Request for Startup of Wildlife Response Strategies (continued)				
Secondary Response Strategies – <i>Hazing/Deterrence</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers
A. Status of permits and authorizations for carcass collection? ➤ If pre-issued, list permit or authorization number and attach at least the first page showing permit/authorization number.	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued
B. Are any of the following present in the area where hazing is proposed?	<input type="checkbox"/> ESA-listed species <input type="checkbox"/> Molting waterfowl <input type="checkbox"/> Colonies <input type="checkbox"/> Migration or staging area <input type="checkbox"/> Nests: Incubating or with hatchlings <input type="checkbox"/> Fledglings <input type="checkbox"/> Active eagle nest	<input type="checkbox"/> ESA-listed species <input type="checkbox"/> Haulouts <input type="checkbox"/> Polar bear dens	<input type="checkbox"/> ESA-listed species <input type="checkbox"/> Haulouts <input type="checkbox"/> Rookeries <input type="checkbox"/> Pups <input type="checkbox"/> Lairs <input type="checkbox"/> BIAs	<input type="checkbox"/> Dens <input type="checkbox"/> Insect relief <input type="checkbox"/> Calving or lambing areas
C. What non-target species might be in the area that could be inadvertently hazed/deterred? What methods will be employed to avoid hazing/deterrence of non-target species?				
D. Who will conduct deterrence/hazing activities (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. ➤ Describe applicable training or expertise. ➤ What is their status (on alert/standby, mobilizing, on site and ready, etc.)? ➤ When will they arrive at the field/spill site?				
E. When is deterrence/hazing expected to begin (be as accurate as possible)?				

continued on next page

IV. Request for Startup of Wildlife Response Strategies (continued)				
Secondary Response Strategies – <i>Hazing/Deterrence (continued)</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers
F. What equipment will be used for deterrence/hazing (Breco buoys, propane cannons, horns, etc.)? ➤ What platform(s) will hazing/deterrence be conducted from (on foot, vessel, etc.)? ➤ Will aircraft, including UAS, be used to haze wildlife?				
G. Who will be responsible for documenting hazing efforts and how will this information be conveyed to the IMT and wildlife agencies?				
H. Number of Wildlife Observers in the field (WPG Tactic Wildlife Reconnaissance)? Describe applicable training or expertise.				

IV. Request for Startup of Wildlife Response Strategies (continued)				
Tertiary Response Strategies – Capture, Transport, Stabilization, Rehabilitation	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, or Porpoises	Brown or Black Bears, Ungulates, or Furbearers
A. Status of permits and authorizations for capture, transport, stabilization, or rehabilitation? ➤ If pre-issued, list permit or authorization number and attach minimum of first page showing permit/authorization number.	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued	<input type="checkbox"/> Requesting <input type="checkbox"/> Pre-issued
B. Who will conduct wildlife capture (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. ➤ Describe applicable training or expertise. ➤ What is their status (on alert/standby, mobilizing, on site and ready, etc.)? ➤ When will they arrive at the field/spill site?				
C. When is capture expected to begin (be as accurate as possible)?				
D. How will wildlife be transported from the field to a stabilization/rehabilitation facility? Include all if multiple.				
E. When are transport capabilities expected to be operational (specify as close as possible)?				
F. Describe any stabilization of wildlife that may occur during transport, including who will do so and their applicable training or expertise.				
G. Will a temporary stabilization facility be set up? If so, where, and when will it be fully operational?				
H. Where will wildlife be held until stabilization or rehabilitation facilities are operational?				
I. Where will oiled wildlife be cleaned and rehabilitated? Who is the veterinarian (name and affiliation) that will oversee wildlife care at the facility?				
J. When will the cleaning and rehabilitation facility be fully operational?				

W... ..

9000 – Appendices

9740.3.7.1 – Startup WRP

Version 2020, January 2020

V. Wildlife Agency Permits and Authorizations for Proposed Response

This section to be filled out by wildlife agencies.

Instructions: For each species group checked, agencies should indicate permit or authorization status using one or more of these: **Initiated** (ESA Section 7 Consultation only); **Pending** (include estimated time of completion); **Issued** (include permit number); **Emergency** Authorization Provided (verbal or email approval, hard copy of permit will follow); **Not applicable** or not required for proposed activities; or **Other** (include comments).

Response activities for each species group as proposed in Section IV of this form may begin as soon as all necessary permits and approvals for that species group are listed as Initiated, Issued, or Emergency.

Species or Species Group	CARCASS COLLECTION		HAZING/DETERRENCE		CAPTURE, TRANSPORT, STABILIZATION, & REHABILITATION	
	Permit/Authorization	Status	Permit/Authorization	Status	Permit/Authorization	Status
Threatened or endangered species	USFWS ESA Section 7 Consultation		USFWS ESA Section 7 Consultation		USFWS ESA Section 7 Consultation	
	NMFS ESA Section 7 Consultation		NMFS ESA Section 7 Consultation		NMFS ESA Section 7 Consultation	
	USFWS ESA OLE Authorization					
Migratory birds	USFWS Migratory Bird Salvage Permit		ADF&G Wildlife Response Permit		USFWS Migratory Bird Rehab Permit	
	USFWS OLE Authorization					
Bald or golden eagles	USFWS Permit		USFWS Eagle Depredation Permit		USFWS Eagle Depredation Permit	
	USFWS OLE Authorization					
Sea otters	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS OLE Authorization					
Walruses	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS OLE Authorization					
Polar bears	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS ESA OLE Authorization					
Whales	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Seals	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Sea lions	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Porpoises	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Brown or black bears	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Ungulates	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Furbearers	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Non-migratory birds	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Fish	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A
Shellfish	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A
Invertebrates	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A

VI. Additional Conditions*This section to be filled out by wildlife agencies.***Instructions:** Wildlife agencies must check each applicable condition and write in any additional conditions or approvals.

Permits, LOAs, and ESA Section 7 consultations will include protection measures, restrictions, or conditions for the proposed activities that must be adhered to. Additional conditions for the following activities include:

Primary Response Strategies – Carcass Collection

- ☐ _____
- ☐ _____

Secondary Response Strategies – Hazing/Deterrence

- ☐ To ensure non-target species are not inadvertently hazed, active hazing/deterrence must cease if the following species are within _____ m (_____ ft) of the spill site or areas where hazing is proposed:

Hazing may not resume until these species have left the area of their own accord.

- ☐ Hazing/deterrence may not occur in areas where molting waterfowl are observed.
- ☐ Hazing/deterrence may not occur within _____ m (_____ ft) of _____.
- ☐ Report observations of _____ to _____.
- ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
- ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
- ☐ Hazing/deterrence activities must be monitored by one or more Wildlife Observers (see WPG Tactic **Wildlife Reconnaissance**), as needed.
- ☐ _____
- ☐ _____

Tertiary Response Strategies – Capture, Transport, Stabilization, and Rehabilitation

- ☐ Report observations of _____ to _____.
- ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
- ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
- ☐ Tertiary response activities must be monitored by a Wildlife Observer (see WPG Tactic **Wildlife Reconnaissance**).
- ☐ _____
- ☐ _____

VII. Worksheet for Operations Section and Field Personnel

This section to be filled out by the RP/PRP.

Instructions: List conditions, stipulations, and protection measures of permits and authorizations as they are finalized and issued. This Worksheet is intended to help convey pertinent details of authorized wildlife response activities from the Environmental Unit to Operations and field personnel. The Environmental Unit Lead or their designee should read and review permits, authorizations, and ESA Section 7 consultation information as they are issued/finalized, and include pertinent protection measures, stipulations, and other conditions for Operations to inform and direct field personnel (e.g., in ICS 204s). This information should be transferred to Section XII of the Comprehensive WRP. This Worksheet does not replace or negate any information found in permits and authorizations. Wildlife agencies may assist with this, but *the permittee or RP/PRP is ultimately responsible for all actions conducted under the authority of each issued permit or authorization.*

Startup Wildlife Response Plan – Version 12/2019

END OF STARTUP WILDLIFE RESPONSE PLAN

1 9740.3.7.2 – Comprehensive WRP

2 The Comprehensive WRP (Figure 9-14) should be completed and approved by the wildlife agencies and
3 the Unified Command before any carcass collection, hazing/deterrence, pre-emptive capture, or capture
4 and rehabilitation activities begin or before the Startup WRP expires. For more information about these
5 this form see [Section 3650.1](#).

6 Word and fillable .pdf versions of the Comprehensive WRP can be found on the ADEC [Area Plan](#)
7 [References and Tools](#) web page. Please check this website for the most recent versions.

Figure 9-14: Comprehensive Wildlife Response Plan (WRP).

I. Incident Summary		
Incident Name:	Date / Time Prepared: /	
Incident Location:	Operational Period Date / Time: From: / To: /	
Prepared By (print):	Affiliation:	ICS Position:
<input type="checkbox"/> Amendment/Update (all previous versions must be attached)		
Attachments:		
<input type="checkbox"/> Location Map/Sketch (ICS 201) or narrative <input type="checkbox"/> Incident Status Summary (ICS 209) or narrative <input type="checkbox"/> Resources at Risk (ICS 232) <input type="checkbox"/> ESA Section 7 Consultation Documents <input type="checkbox"/> Completed Wildlife Observation Forms <input type="checkbox"/> Other _____	<input type="checkbox"/> Pre-Issued ADF&G Wildlife Response Permit(s) <input type="checkbox"/> Pre-Issued USFWS Permit(s) or Authorization(s) <input type="checkbox"/> Pre-Issued NMFS Authorization(s)	

II. State and Federal On-Scene Coordinator Response to Request	
State On-Scene Coordinator's decision regarding proposed wildlife response activities:	
Time Received:	Date Received:
<input type="checkbox"/> Concur with wildlife agencies. <input type="checkbox"/> Do not concur for the following reason(s):	
Signature:	
Time:	Date:
Federal On-Scene Coordinator's decision regarding proposed wildlife response activities:	
Time Received:	Date Received:
<input type="checkbox"/> Concur with wildlife agencies. <input type="checkbox"/> Do not concur for the following reason(s):	
FOSC must also inform NRDAR Liaison	
Signature:	
Time:	Date:

III. Wildlife Agency Response to Request		
ADF&G Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
USFWS Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
NMFS Recommendation/Decision:		
<input type="checkbox"/> Approve requested activities as proposed <input type="checkbox"/> Approve requested activities as amended <input type="checkbox"/> Deny requested activities for the following reason(s):		
Signature:	Date:	Time:

Acronyms in Comprehensive WRP	
ADF&G = Alaska Department of Fish and Game	NMFS = National Marine Fisheries Service
BIA = Biologically Important Area (https://coast.noaa.gov/digitalcoast/data/biologicallyimportantareas.html)	OLE = Office of Law Enforcement
ESA = Endangered Species Act	OSRO = Oil Spill Removal/Recovery Organization
ICS = Incident Command System	PRAC = Primary Response Action Contractor
IMT = Incident Management Team	RP/PRP = Responsible Party/Potential Responsible Party
LOA = Letter of Authorization	UAS = unmanned aerial/aircraft system, "drones"
MMHSRP = Marine Mammal Health and Stranding Response Program	USFWS = U.S. Fish and Wildlife Service
MMPA = Marine Mammal Protection Act	WPG = Wildlife Protection Guidelines
	WRP = Wildlife Response Plan

IV. Wildlife Information and Proposed Response Strategies: Part A – Non-ESA-listed Species Groups						
<i>This section to be filled out by RP/PRP.</i>						
Instructions: 1 and 2: Use field observations from the spill area or pre-existing data sources if no field data are available. 3: Check proposed response strategies for each species or species group in cooperation with available experts and agency representatives. Part A is only for species not listed under the ESA.						
1. Is species or species group known or expected to be present in the spill area?		2. If Yes, list specific species information:	3. Identify Proposed Response Strategies			
			Primary	Secondary		Tertiary
			Carcass Collection	Haze/Deter	Pre-emptive Capture	Capture and Rehab
Species Group	Yes	Species, numbers (estimated or observed), and location relative to spill, etc.	Yes	Yes	Yes	Yes
Bald or golden eagles	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Raptors	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waterfowl	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Diving ducks	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shorebirds	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Seabirds	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Passerines	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-migratory birds	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brown or black bears	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ungulates (moose, deer, caribou, etc.)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Small furbearers (fox, muskrat, river otter, etc.)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wolves	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Northern sea otter	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Southcentral or Southeast DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Walrus	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harbor, spotted, or ribbon seals	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Northern fur seal	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steller sea lion Eastern DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minke, killer, gray, beluga, or humpback whales (non-ESA-listed)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dolphins or porpoises	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Invertebrates	<input type="checkbox"/>		<input type="checkbox"/>	N/A	N/A	N/A
Fish or shellfish	<input type="checkbox"/>		<input type="checkbox"/>	NA	N/A	N/A
Other	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV. Wildlife Information and Proposed Response Strategies: Part B – ESA-listed Species						
<i>This section to be filled out by RP/PRP.</i>						
Instructions: 1 and 2: Use field observations from the spill area or pre-existing data sources if no field data is available. 3: Identify the proposed response strategies for each species or species group in cooperation with available experts and agency representatives. Part B is for species listed under the ESA.						
1. Is species or species group known or expected to be present in the spill area?		2. If Yes, list specific species information:	3. Identify Proposed Response Strategies			
			Primary	Secondary		Tertiary
			Carcass Collection	Haze/Deter	Pre-emptive Capture	Capture and Rehab
Species	Yes	Species, numbers (estimated or observed), and location relative to spill, etc.	Yes	Yes	Yes	Yes
Steller's eider	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Spectacled eider	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Short-tailed albatross	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Eskimo curlew	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Northern sea otter	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Southwest Alaska DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Polar bear	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steller sea lion Western DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ringed seal	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bearded seal	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Beluga whale Cook Inlet DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Blue whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bowhead whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fin whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
North Pacific right whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sei whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sperm whale	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Humpback whale Mexico or Western North Pacific DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gray whale Western North Pacific DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wood Bison	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leatherback turtle	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Green turtle	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Loggerhead turtle	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

V. Other Primary Response Actions

This section to be filled out by the RP/PRP.

Instructions: Check any primary response actions underway or previously taken: (1) to protect wildlife and/or wildlife habitat, and (2) which may affect the proposed wildlife response activities. Describe any additional actions underway or previously taken.

- ☐ Control and contain the source of the spill.
- ☐ Mechanical recovery (boom, skimmers, etc.).
- ☐ Sensitive area protection (booming of anadromous streams, marine mammal haulouts, seabird rookeries, etc.).
- ☐ Non-mechanical recovery (dispersants or *in-situ* burning)
- ☐ Removal of oiled debris (kelp, driftwood, etc.)
- ☐ Other: _____
- ☐ Other: _____

VI. Carcass Collection Plan

This section to be filled out by the RP/PRP.

Instructions: Include information for each species or species group checked in Section IV, Parts A and B. Any differences between each species group must be clearly articulated. If more space is needed attach a separate Word® document referencing appropriate section and numbers (for example, IV., 1., C.) or reference and include applicable attachments.

1. List pre-existing permits and authorizations, and those that were obtained for carcass collection through the Startup WRP process.
2. How will oiled carcasses be observed and reported to Unified Command and wildlife agencies (for example, actively searching collection teams, carcasses reported through opportunistic field observations)?
3. Describe or indicate on a map where carcasses will be searched for or collected, or where opportunistic observations will occur.
4. Who will collect oiled carcasses (contractors, agency staff, spill removal organizations)?
5. Describe carcass collection teams: How many, whether they have other duties (for example, opportunistic/as needed vs. sole duty for large numbers of carcasses), number of collectors and their ICS positions (e.g., Carcass Collection Task Force member).
6. What supplies and equipment will be used; where is it stored; how will it get to the field?
7. Describe the data collection plan and any forms that will be used to document carcass collection activities.
8. How will carcasses be transported from the field (boat, plane, vehicle, etc.)?
9. How and where will carcasses be stored until handed over to agencies (for example, freezer space, refrigerator, coolers at staging area, morgue)?
10. Where will a morgue be set up (staging area, warehouse, etc.)? How will the morgue be secured and who will have access to it?
11. Has a carcass custodian from one of the wildlife agencies been requested? Who will receive the carcasses prior to the agency custodian being on site?
12. Describe in detail any deviations that will be made from the WPG Tactic **Collection of Small Carcasses and Documentation of Large Carcasses**.
13. Describe any additional details necessary for Incident Command to fully understand implementation of this plan.
14. How has this plan been coordinated with NRDAR Trustees?

Summary of Wildlife Agency Comments: Section VI. Carcass Collection Plan
Instructions for agency representatives: Indicate the number in Section VI to which your comment refers. Include recommended language for additions, deletions, requests for additional details, or other comments.
ADF&G comments:
USFWS comments:
NMFS comments:

VII. Hazing/Deterrence Plan

This section to be filled out by the RP/PRP.

Instructions: Include information for each species or species group checked in Section IV, Parts A and B. Any differences between each species group must be clearly articulated. If more space is needed attach a separate Word® document referencing appropriate section and numbers (for example, IV.,1., C.) or reference and include attachments.

1. List pre-existing permits and authorizations, and those that were obtained for hazing/deterrence through the Startup WRP process.
2. Which species/species groups are intended to be hazed/deterred?
3. What non-target species might be in the area that could be inadvertently hazed/deterred? What methods will be employed to avoid hazing/deterrence of non-target species?
4. Describe or indicate on a map areas where wildlife will be deterred/hazed from (for example, priority response areas or as wildlife are encountered). Describe nearby suitable habitat where wildlife are intended to be hazed to, including distance and direction from their current location.
5. Who will be conducting hazing/deterrence activities (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. Describe applicable training or expertise, include affiliation, names (if known), and person in charge (with ICS position) of deterrence activities.
6. Describe the method and type of equipment that will be used for each species group? Include the platform(s) hazing/deterrence will be conducted from (on foot, boat, etc.) and if any aircraft, including UAS, will be used to haze/deter wildlife.
7. Who (name or ICS position) will be responsible for documenting the success/failure of hazing efforts (e.g., a Wildlife Observer (see WPG Tactic **Wildlife Reconnaissance**), one of the persons conducting hazing, etc.)?
8. Describe the documentation/communication plan. What information will be documented, by whom, and how often will it be communicated to the IMT?
9. Describe what next steps will be taken if hazed species inadvertently become oiled.
10. Describe or attach any additional details necessary for Incident Command to fully understand implementation of this plan, such as guidance documents, tactic descriptions, or other instructions.

Summary of Wildlife Agency Comments: Section VII. Hazing/Deterrence Plan
Instructions for agency representatives: Indicate the number in Section VII to which your comment refers. Include recommended language for additions, deletions, requests for additional details, or other comments.
ADF&G comments:
USFWS comments:
NMFS comments:

DRAFT

VIII. Pre-emptive Capture Plan

This section to be filled out by the RP/PRP.

Instructions: Include information for each species or species group checked in Section IV, Parts A and B. Any differences between each species group must be clearly articulated. If more space is needed attach a separate Word® document referencing appropriate section and numbers (for example, IV., 1., C.) or reference and include attachments.

1. Who is capturing wildlife? Provide affiliation and applicable training. Names of individuals must be provided for the proposed capture of any marine mammals, eagles, or ESA-listed species.
2. Describe all aspects of wildlife transportation. How will each species be transported from the field, where are they being transported to (for example, stabilization facility, temporary holding location, proposed release site)?
3. Describe the stabilization facility or temporary holding location/facility. Provide the name of the individual or ICS position in charge of the chain-of-custody paperwork at the stabilization facility. Attach a plan describing the detailed care of each species (e.g., feeding, nutrition, temperature control, etc.)
4. Provide the name and affiliation of the veterinarian(s) in charge of monitoring captured wildlife.
5. Describe why the release site was chosen (for example, location or habitat characteristics).
6. Provide the name, ICS position, and contact information for the person responsible for writing a release plan (e.g., release date and location, appropriate tagging/banding or final disposition of the animal, etc.) and coordinating review of the plan with the appropriate wildlife agency.
7. Describe or attach any additional details necessary for Incident Command to fully understand implementation of this plan, such as guidance documents, tactic descriptions, or other instructions.

Summary of Wildlife Agency Comments: Section VIII. Pre-emptive Capture Plan
Instructions for agency representatives: Indicate the number in Section VIII to which your comment refers. Include recommended language for additions, deletions, requests for additional details, or other comments.
ADF&G comments:
USFWS comments:
NMFS comments:

IX. Capture, Transport, Stabilization, Rehabilitation, and Release Plan

This section to be filled out by the RP/PRP.

Instructions: Include information for each species or species group checked in Section IV, Parts A and B. Any differences between each species group must be clearly articulated. If more space is needed attach a separate Word® document referencing appropriate section and numbers (for example, IV., 1., C.) or reference and include attachments.

1. List pre-existing permits and authorizations, and those that were obtained for capture, transport, stabilization, and rehabilitation through the Startup WRP process.
2. Provide affiliation and applicable training of wildlife capture personnel. Names of individuals must be provided for the proposed capture of any marine mammals, eagles, or ESA-listed species.
3. Describe all aspects of wildlife transportation. How will each species be transported from the field, where are they being transported to (for example, stabilization facility, temporary holding location, proposed release site)?
4. Describe the temporary stabilization facility(ies) if one or more will be used. Provide the name of the individual or ICS position in charge of the chain-of-custody paperwork at the stabilization facility.
5. Where is the cleaning and rehabilitation facility(ies)?
6. Provide the name and affiliation of the veterinarian(s) in charge of cleaning and rehabilitation of oiled wildlife.
7. Provide the name of the individual or ICS position in charge of the chain-of-custody paperwork at the rehabilitation facility.
8. Describe fresh/marine water sources and daily capacity in gallons (fresh and/or marine) for cleaning and holding of wildlife.
9. Describe how waste and wastewater is being handled, including daily capacity, for a) oily water, b) wastewater with natural animal contaminants (fecal matter, skin, fur, food, fish, etc.), and c) biomedical waste, including drugs.
10. Describe how wildlife will be held while in rehabilitation and estimated time individuals in each species group will remain in rehabilitation.
11. Describe disposal or storage for euthanized or deceased animals (e.g., will they be transported to the morgue location outlined in Section VI, will another morgue be established at rehabilitation facility, will animal be transported to wildlife agency, or another option). Attach euthanasia plan or describe in adequate detail here.
12. Provide the name, ICS position, and contact information for the person/people responsible for writing a release plan (e.g., release date and location, appropriate tagging/banding or final disposition of the animal, etc.) and coordinating review of the plan with the appropriate wildlife agency.
13. Describe or attach any additional details necessary for Incident Command to fully understand implementation of this plan, such as guidance documents, tactic descriptions, or other instructions.

Summary of Wildlife Agency Comments: Section IX. Capture, Transport, Stabilization, Rehabilitation, and Release Plan
Instructions for agency representatives: Indicate the number in Section IX to which your comment refers. Include recommended language for additions, deletions, requests for additional details, or other comments.
ADF&G comments:
USFWS comments:
NMFS comments:

X. Wildlife Agency Permits and Authorizations for Proposed Response*This section to be filled out by wildlife agencies.*

Instructions: For each species group checked, agencies should indicate permit or authorization status using one or more of these: **Initiated** (ESA Section 7 Consultation only); **Pending** (include estimated time of completion); **Issued** (include permit number); **Emergency** Authorization Provided (verbal or email approval, hard copy of permit will follow); **Not applicable** or not required for proposed activities; or **Other** (include comments).

Response activities for each species group as proposed in Sections VI – IV of this form may begin as soon as all necessary permits and approvals for that species group are listed as Initiated, Issued, or Emergency.

Species or Species Group	CARCASS COLLECTION		HAZING/DETERRENCE		CAPTURE, TRANSPORT, STABILIZATION, & REHABILITATION	
	Permit/Authorization	Status	Permit/Authorization	Status	Permit/Authorization	Status
Threatened or endangered species	USFWS ESA Section 7 Consultation		USFWS ESA Section 7 Consultation		USFWS ESA Section 7 Consultation	
	NMFS ESA Section 7 Consultation		NMFS ESA Section 7 Consultation		NMFS ESA Section 7 Consultation	
	USFWS ESA OLE Authorization					
Migratory birds	USFWS Migratory Bird Salvage Permit		ADF&G Wildlife Response Permit		USFWS Migratory Bird Rehab Permit	
	USFWS OLE Authorization					
Bald or golden eagles	USFWS Permit		USFWS Eagle Depredation Permit		USFWS Eagle Depredation Permit	
	USFWS OLE Authorization					
Sea otters	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS OLE Authorization					
Walruses	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS OLE Authorization					
Polar bears	USFWS Permit		USFWS MMPA Section 112(c) LOA		USFWS MMPA Section 112(c) LOA	
	USFWS ESA OLE Authorization					
Whales	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Seals	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Sea lions	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Porpoises	NMFS MMHSRP Request		NMFS MMHSRP Request		NMFS MMHSRP Request	
Brown or black bears	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Ungulates	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Furbearers	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Non-migratory birds	ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit		ADF&G Wildlife Response Permit	
Fish	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A
Shellfish	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A
Invertebrates	ADF&G Aquatic Resources Permit		N/A	N/A	N/A	N/A

XI. Additional Conditions*This section to be filled out by wildlife agencies.***Instructions:** Wildlife agencies must check each applicable condition and write in any additional conditions or approvals.

Permits, LOAs, and ESA Section 7 consultations will include protection measures, restrictions, or conditions for the proposed activities that must be adhered to. Additional conditions for the following activities include:

Primary Response Strategies – Carcass Collection

- ☐ _____
- ☐ _____

Secondary Response Strategies – Hazing/Deterrence

- ☐ To ensure non-target species are not inadvertently hazed, active hazing/deterrence must cease if the following species are within _____ m (_____ ft) of the spill site or areas where hazing is proposed:

Hazing may not resume until these species have left the area of their own accord.

- ☐ Hazing/deterrence may not occur in areas where molting waterfowl are observed.
- ☐ Hazing/deterrence may not occur within _____ m (_____ ft) of _____.
- ☐ Report observations of _____ to _____.
- ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
- ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
- ☐ Hazing/deterrence activities must be monitored by one or more Wildlife Observers (see WPG Tactic **Wildlife Reconnaissance**), as needed.
- ☐ _____
- ☐ _____

Tertiary Response Strategies – Capture, Transport, Stabilization, and Rehabilitation

- ☐ Report observations of _____ to _____.
- ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
- ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
- ☐ Tertiary response activities must be monitored by a Wildlife Observer (see WPG Tactic **Wildlife Reconnaissance**).
- ☐ _____
- ☐ _____

XII. Worksheet for Operations Section and Field Personnel

This section to be filled out by the RP/PRP.

Instructions: List conditions, stipulations, and protection measures of permits and authorizations as they are finalized and issued. This Worksheet is intended to help convey pertinent details of authorized wildlife response activities from the Environmental Unit to Operations and field personnel. The Environmental Unit Lead or their designee should read and review permits, authorizations, and ESA Section 7 consultation information as they are issued/finalized, and include pertinent protection measures, stipulations, and other conditions for Operations to inform and direct field personnel (e.g., in ICS 204s). Some of this information may be obtained from Section VII of the Startup WRP. This Worksheet does not replace or negate any information found in permits and authorizations. Wildlife agencies may assist with this, but *the permittee or RP/PRP is ultimately responsible for all actions conducted under the authority of each issued permit or authorization.*

Comprehensive Wildlife Response Plan – Version 12/2019

END OF COMPREHENSIVE WILDLIFE RESPONSE PLAN

DRAFT