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Pribilof Islands Wildlife Protection Guidelines for Oil Spill Response

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3

Alaska Regional Response Team

4

Wildlife Protection Committee

5

Pribilof Islands Working Group

6

Version 2023.1

7

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26 to impacts from an oil spill; the species has been given a special status by state or federal agencies;

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1 ACRONYMS & ABBREVIATIONS

AAC	Alaska Administrative Code
ACP	Area Contingency Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
AK Stranding Network	NOAA Alaska Region Marine Mammal Stranding Network
Alaska RCP	Alaska Regional Contingency Plan
Alaska WPG	Wildlife Protection Guidelines for Oil Spill Response in Alaska
ARRT	Alaska Regional Response Team
AWA	Arctic and Western Alaska
BGEPA	Bald and Golden Eagle Protection Act
BMPs	Best Management Practices
CFR	Code of Federal Regulations
CG	Coast Guard (short for U.S. Coast Guard)
CoC	Chain of Custody
CRRC	Coastal Response Research Center
DOC	U.S. Department of Commerce
DOI	U.S. Department of the Interior
DPS	Distinct Population Segment
ECO	Aleut Community of St. Paul Ecosystem Conservation Office
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
EU	Environmental Unit
FAA	Federal Aviation Administration
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
MARPOL	International Convention for the Prevention of Pollution from Ships
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
M/V	Motor Vessel
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
OLE	Office of Law Enforcement
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator
OSRO	Oil Spill Removal Organization
PI WPG	Pribilof Islands Wildlife Protection Guidelines
PPE	Personal Protective Equipment
PRAC	Primary Response Action Contractor
RAR	Resources at Risk
RCP	Regional Contingency Plan
RP/PRP	Responsible Party/Potentially Responsible Party
R/V	Research Vessel
SA	Stranding Agreement
SCAT	Shoreline Cleanup Assessment Technique
UAS	Uncrewed Aircraft System
USC	United States Code
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WB	Wildlife Branch
WBD	Wildlife Branch Director
WPC	Wildlife Protection Committee
WRP	Wildlife Response Plan

1 HOW TO USE THE PRIBILOF ISLANDS WILDLIFE PROTECTION 2 GUIDELINES

3 The *Pribilof Islands Wildlife Protection Guidelines for Oil Spill Response* (PI WPG) provides spill
4 responders the tools and background information needed to address wildlife concerns during a spill
5 response in the Pribilof Islands. Users of the PI WPG should be familiar with the *Incident Command*
6 *System (ICS) in Oil Spill Response*, available from the [Homeland Security Digital Library](#); the oil spill
7 response planning structure outlined in the *National Oil and Hazardous Substances Pollution*
8 *Contingency Plan* (NCP; particularly § 300.210, .600, and .175, which discuss wildlife response,
9 designation of federal trustees, and federal agency responsibilities, respectively; available at this [EPA](#)
10 [webpage](#)); the *Alaska Regional Contingency Plan* (Alaska RCP); and the *Arctic and Western Alaska Area*
11 *Contingency Plan* (ACP). The Alaska RCP and both ACPs are available on the Alaska Department of
12 Environmental Conservation (ADEC) [Regional Contingency Plan](#) webpage.

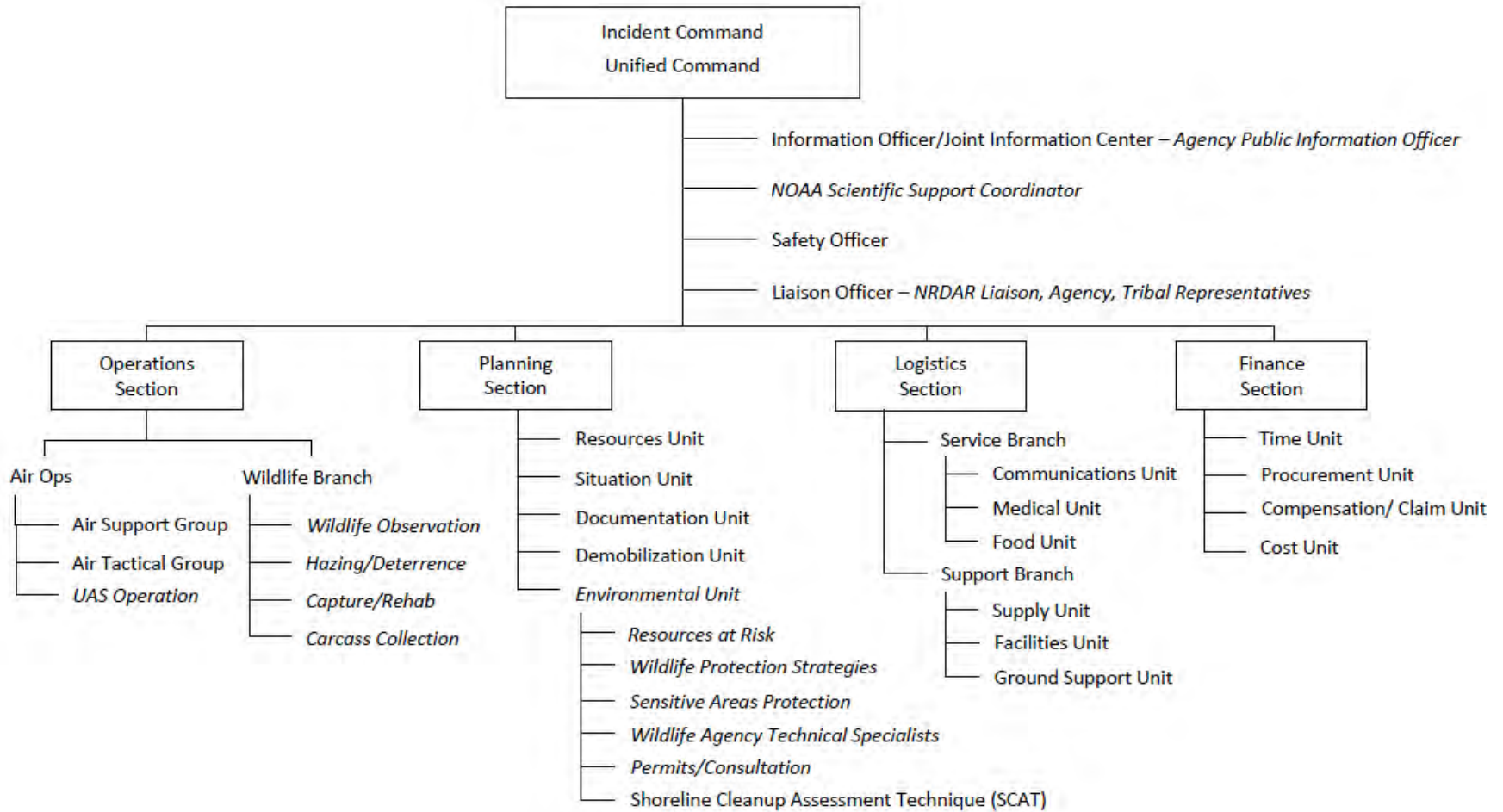
13 The PI WPG provides additional site-specific details to the *Wildlife Protection Guidelines for Oil Spill*
14 *Response in Alaska* (Alaska WPG), which is the Alaska Regional Response Team (ARRT) Wildlife
15 Protection Committee (WPC) document that addresses wildlife concerns throughout Alaska. The Alaska
16 WPG document is available at this [ADEC webpage](#). The PI WPG contains information specific to the
17 Pribilof Islands and refers to the Alaska WPG for information that applies to wildlife response in Alaska
18 more broadly. We have also included the Appendices from the Alaska WPG in this document for user
19 convenience. The PI WPG provides useful guidance for spill response related to northern fur seals and
20 other wildlife on Bogoslof Island as well as the Pribilof Islands.

21 The PI WPG Table of Contents numbering system matches the Table of Contents of the ACPs and the
22 Alaska WPG. Because only ACP headers relevant to the PI WPG are used in this document, the PI WPG
23 headers are disjunct between and within some sections. However, adopting the ACP Table of Contents
24 numbering facilitates inclusion of the PI WPG into ACPs and helps users more easily find information
25 applicable to their roles. Use of this numbering system also divides the PI WPG information into relevant
26 ICS Sections ([Figure i-1](#)), particularly Operations and Planning (Sections [3000](#) and [4000](#), respectively).
27 [Figure i-2](#) outlines general categories of wildlife considerations, cross-referenced by location in the PI
28 WPG.

29 In case of limited internet connectivity during an incident, it is recommended that industry contingency
30 plan holders and the contacts shown in [Table i-1](#) maintain current hard copies of this document (PI
31 WPG), the Alaska WPG, and the guidance documents that the PI WPG and Alaska WPG reference.

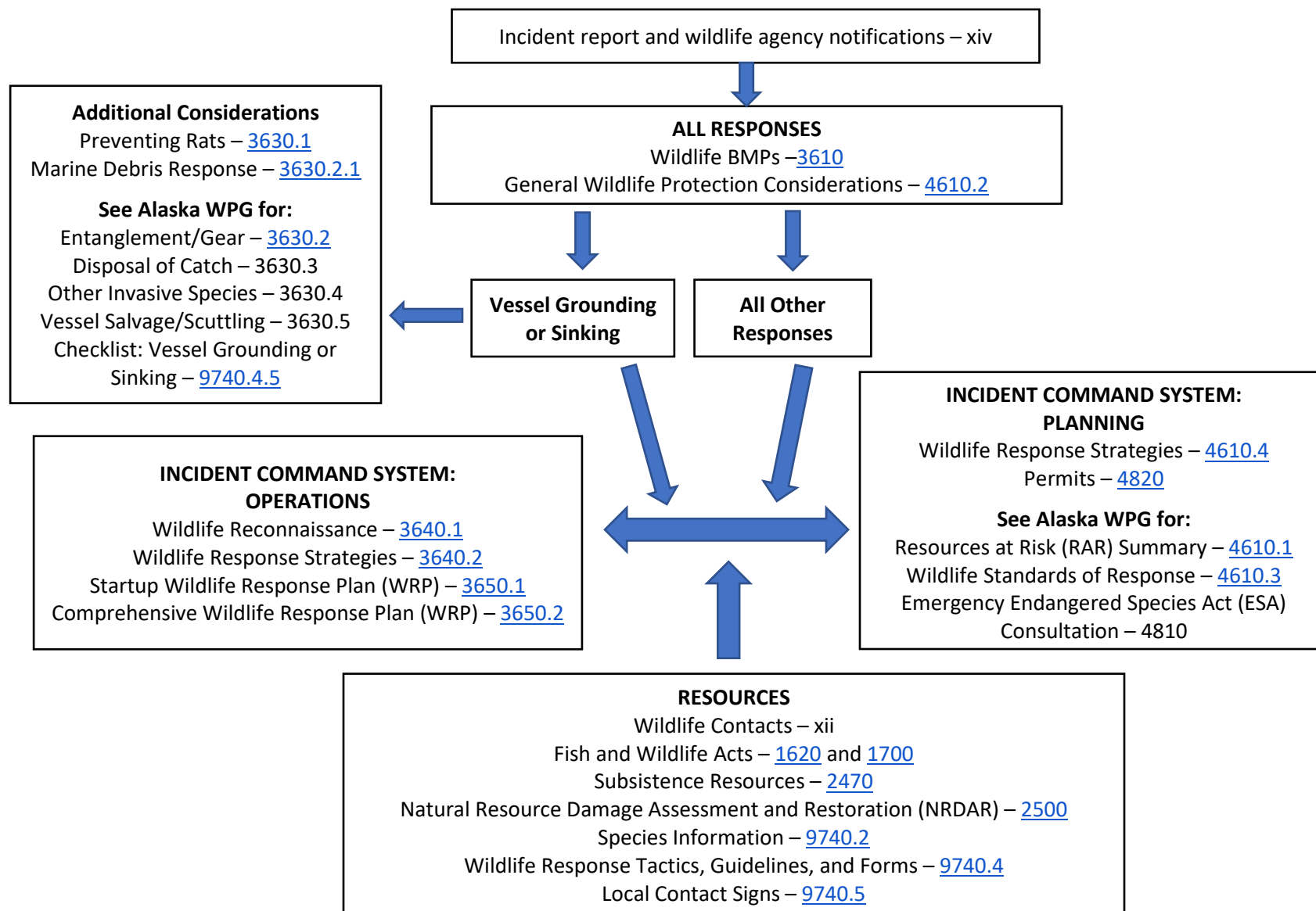
32 Regarding the use of place names in the PI WPG: we have opted to use the legal place names for Saint
33 Paul Island and St. George Island throughout the document. Variations of these spellings occur in the
34 names of organizations that have chosen to use a different spelling. We have also chosen to refer to the
35 Pribilof Islands as the Pribilofs.

- 1 Figure i-1. Organization Chart of a Typical Incident Command System (ICS) for an Oil Spill with Wildlife Response. Wildlife-related response
- 2 activities or roles are in italics.



3

1 Figure i-2. Flow chart showing the sections of the PI WPG or Alaska WPG to access detailed information on the listed topics.



2

1 **WILDLIFE CONTACTS**

2 The following are contacts specific to the Pribilof Islands. For statewide agency contacts, see the Alaska
 3 WPG.

4 NOTICE: If you see oiled wildlife, even if you are uncertain, contact one of the following individuals:

5 Table i-1. On-Island Oiled Wildlife Contacts: Saint Paul and St. George Islands

Contact	Phone
Aleut Community of St. Paul Island Tribal Government, Ecosystem Conservation Office (ECO)	General: 907-546-3200 Direct: 907-546-3226
ECO Island Sentinel: Paul Melovidov	Cell: 907-546-4030
ECO Director: Lauren Divine	Cell: 907-891-3031
City of Saint Paul (General Line) Department of Public Safety	911 or 907-202-8586 or 907-546-3130
TDX: Dennis Bourdukofsky	Wk: 907-546-2312 Wk: 907-546-4103 Hm: 907- 546-2220
St. George Traditional Council: Darlene Lekanof - President	Wk: 907-859-2241 Hm: 907-859-2250
St. George ECO: Mark Mercurief, Jr.	Wk: 907-859-2447
St. George Tanaq Corporation: Todd Lestenkof (Primary)	Wk: 907-859-2255
City of St. George: Mark Mercurief, Jr - Mayor Alternate: Grace Mercurief - Administrator	Hm: 907-859-2324 Wk: 907-859-2263

6 Table i-2. Wildlife Resource Agency Emergency Contacts: Pribilof Islands

Contact	Phone
ADF&G Primary: Habitat Section	Wk: 907-267-2342
ADF&G Alternate: Jeanette Alas	Wk: 907-267-2805
ADF&G Alternate: Andrew Kastning	Wk: 907-267-2813
NMFS Primary: Mike Williams	Wk: 907-271-5117 Hm: 907-748-0706
NMFS 24/7 Marine Mammal Response Hotline	Wk: 877-925-7773
NMFS Alternate: Sadie Wright	Wk: 907-586-7630 Cell: 907-957-8147
NMFS Alternate: Tom Gelatt	Wk: 206-526-4040 Cell: 206-963-8450
NMFS Alternate: Rolf Ream	Wk: 206-526-4328 Cell: 206-491-6813
USFWS Contact: USFWS Spill Response Coordinator, Alaska Region	Cell: 907-242-6893 fwsakspillresponse@fws.gov

7

1 **1000 - INTRODUCTION**

2 The Pribilof Islands, including Saint Paul, St. George, Walrus, and Otter Islands, and Sea Lion Rock, are
3 located in the Bering Sea approximately 300 miles off the west coast of Alaska. The Pribilof Islands
4 (hereafter referred to as the Pribilofs) are among the most environmentally sensitive areas in North
5 America. During the warmer months, particularly from mid-May to September, the area is home to
6 approximately one million northern fur seals and about three million seabirds. The fur seals and several
7 seabird species present in the Pribilof Islands during these months represent significant portions of their
8 global populations. The islands and their offshore areas also provide important seasonal feeding,
9 breeding, reproducing, and staging grounds for significant numbers of other migratory birds and marine
10 mammals. Many of these wildlife species also serve as important subsistence resources.

11 Because of their interdependence with the marine environment, during an oil spill affecting offshore or
12 coastal areas, wildlife may come into contact oil in the water or along shorelines, marshes, or tide lands.
13 The number of individuals and species affected will depend on several variables, such as the location
14 and size of the spill, the characteristics of the oil, weather and water conditions, types of habitats
15 affected, and the time of year the spill occurs.

16 The PI WPG also addresses measures to help ensure that overall response activities are conducted in a
17 manner that minimizes adverse effects to wildlife, such as the prevention of unnecessary or illegal
18 disturbance to sensitive species and habitats. Section [3620](#) in this document and Section [4610.2.2](#) of the
19 Alaska WPG contain examples and additional information on this topic. In addition, the PI WPG
20 addresses the protection of wildlife from rats associated with grounded-vessel incidents and response-
21 related vessels (see Sections [3630.1](#) and [4610.2.1](#)).

22 The PI WPG focuses on two principal wildlife resources – migratory birds and marine mammals – that
23 are at risk during an oil spill on shore or in offshore and/or coastal waters or freshwater. Sections
24 [9740.2.1](#) and [9740.2.2](#) contain population and distribution information for migratory birds and marine
25 mammals, respectively. Wildlife protection information for other species that occur on the Pribilofs,
26 such as terrestrial mammals (e.g., Arctic foxes) is found in the Alaska WPG. The PI WPG focuses on
27 migratory birds and marine mammals because of their susceptibility and vulnerability to oiling and
28 because of the importance of those species, both biologically and as a subsistence resource.

29 **1600 - NATIONAL POLICY AND DOCTRINE**

30 **1610 - Relationship to National Planning Requirements and Guidance**

31 Under the Oil Pollution Act of 1990 (OPA 90) section 4201 (33 United States Code (USC) § 1321(c)), the
32 NCP set forth requirements for ACPs to include a “Fish and Wildlife and Sensitive Environments Plan”
33 consistent with the NCP “to provide for coordinated, immediate and effective protection, rescue, and
34 rehabilitation of, and minimization of risk of injury to, fish and wildlife resources and habitat” (40 Code
35 of Federal Regulations (CFR) § 300.210(c)(4)(i)). The Alaska WPG and PI WPG fulfill the NCP
36 requirements regarding wildlife response planning.

37 For additional information on federal, state, tribal, and local authorities, refer to the Alaska RCP,
38 available on the ADEC [Regional Contingency Plan](#) webpage. For a summary of food-related statutes,
39 regulations, and authorities, as well as guidance and best practices during a spill response, see *Ensuring*
40 *Food Safety Following an Oil Spill in Alaska: Regulatory Authorities and Responsibilities*, available on the
41 Oil Spill Recovery Institute [Available Reports](#) webpage.

1 **1620 - Fish and Wildlife Acts Compliance**

2 Under federal statutes, the U.S. Department of Interior’s (DOI) U.S. Fish and Wildlife Service (USFWS)
3 has responsibility for managing and protecting migratory birds under the Migratory Bird Treaty Act
4 (MBTA); eagles under the Bald and Golden Eagle Protection Act (BGEPA); Endangered Species Act (ESA)-
5 listed birds; walrus, polar bears, and sea otters under the Marine Mammal Protection Act (MMPA);
6 and polar bears and some populations of sea otters under the ESA. The U.S. Department of Commerce’s
7 (DOC) National Marine Fisheries Service (NMFS) has responsibility for managing and protecting all other
8 marine mammals under the MMPA and ESA, and marine fishes and invertebrates under the ESA and
9 Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA).

10 Under State of Alaska statutes, the Alaska Department of Fish and Game (ADF&G) is responsible for
11 managing and protecting fish and wildlife resources in Alaska. ADF&G has joint statutory responsibilities
12 with NMFS and USFWS to manage and protect certain species of wildlife, including with USFWS for
13 wildlife on all federal lands (National Park System units, National Wildlife Refuges [NWRs], National
14 Forest System lands, military reservations, and other federally managed public lands) in Alaska.

15 A variety of federal laws may need to be considered during spill planning and response. See the Alaska
16 WPG for specific information about the following federal laws:

- 17 1620.1 - Migratory Bird Treaty Act (MBTA)
- 18 1620.2 - Marine Mammal Protection Act (MMPA)
- 19 1620.3 - Endangered Species Act (ESA)
- 20 1620.4 - Bald and Golden Eagle Protection Act (BGEPA)
- 21 1620.5 - Fur Seal Act
- 22 1620.6 - Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA)
- 23 1620.7 - Non-Indigenous Aquatic Nuisance Prevention and Control Act (NANPCA) and National
24 Invasive Species Act (NISA)

25 **1630 - Federal Wildlife Response Guidance**

26 The PI WPG incorporates guidance from the following wildlife response documents:

27 Arctic Marine Mammal Disaster Response Guidelines

28 National Marine Fisheries Service. 2017. NMFS Arctic Marine Mammal Disaster Response Guidelines.
29 U.S. DOC., NOAA Technical Memorandum NMFS-F/AKR-16. 81 p + appendices. Available from the
30 [NOAA Institutional Repository](#).

31 Best Practices for Migratory Bird Care during Oil Spill Response

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

34 Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines

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

1 Emergency Care and Rehabilitation of Oiled Sea Otters

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

5 Pinniped and Cetacean Oil Spill Response Guidelines (National Guidelines)

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

9 **1700 - ALASKA STATUTES AND REGULATIONS**

10 **1710 - Alaska Fish and Wildlife Statutes, Acts, and Policies**

11 Under State of Alaska statutes, ADF&G is responsible for managing and protecting fish and wildlife
12 resources in Alaska. ADF&G also has permitting responsibility for land and water use activities that may
13 affect habitat in fish-bearing streams and in the state’s legislatively designated special areas. ADF&G has
14 joint statutory responsibilities with NMFS and USFWS to manage and protect certain species of wildlife,
15 including with USFWS for wildlife on federal lands.

16 **1710.1 - Fish Habitat Permit**

17 The **Anadromous Fish Act (Alaska Statute (AS) 16.05.871-.901)** requires prior notification and
18 authorization from ADF&G before altering or affecting “the natural flow or bed” of a specified
19 anadromous water body. All activities within or across a specified anadromous water body require
20 approval from the Habitat Section, including road crossings; gravel removal; mining; water withdrawals;
21 the use of vehicles or equipment in the waterway; stream realignment or diversion; bank stabilization;
22 and the placement, excavation, deposition, or removal of any material. Permitting requirements apply
23 to individuals, commercial entities, government agencies, and other organizations.

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

27 For more information on Fish Habitat Permits, see the ADF&G [Fish Habitat Permits](#) webpage.

28 **1710.2 - Wildlife Response Permit (Carcass Collection, Hazing/Deterrence, and Capture and**
29 **Rehabilitation)**

30 Alaska Statute 16.05.920 prohibits the take,¹ possession, and transport of fish, game,² or marine aquatic
31 plants unless authorized by permit. The ADF&G Commissioner delegates Habitat Section biologists the
32 authority to issue permits for the salvage (carcass collection), hazing, and rehabilitation of birds and
33 terrestrial mammals during oil spills, and the salvage of fish and invertebrates.

¹ “Take’ means taking, pursuing, hunting, fishing, trapping, or in any manner disturbing, capturing, or killing or attempting to take, pursue, hunt, fish, trap, or in any manner capture or kill fish or game.” Alaska Statute 16.05.940(34).

² “Game’ means any species of bird, reptile, and mammal, including a feral domestic animal, found or introduced in the state, except domestic birds and mammals; and game may be classified by regulation as big game, small game, furbearers or other categories considered essential for carrying out the intention and purposes of AS 16.05 – 16.40.” Alaska Statute 16.05.940(19).

1 For more information on ADF&G authorities related to fish and wildlife capture and transportation, see
2 the ADF&G [Mammals, Bird & Reptile Permits](#) webpage.

3 **1710.3 - Aquatic Resource Permit**

4 Alaska Statute 16.05.920 prohibits the take, possession, and transport of fish, game, or marine aquatic
5 plants unless authorized by permit. The provisions of regulation 5 AAC 41.600 govern the collection,
6 transportation, possession, propagation, or release of aquatic organisms transplanted as a part of a
7 program for scientific, educational, or propagative purposes. The Division of Sport Fish has authority to
8 issue permits for the capture of live (oiled or unoiled) fish, invertebrates, and amphibians in fresh water,
9 and the Division of Commercial Fisheries has authority for all organisms (except for those that are
10 federally managed) in marine state waters. An Aquatic Resource Permit is also required for the
11 collection of marine aquatic plants or parts thereof that are still naturally attached to the substrate. A
12 permit may also be required in Nonsubsistence Use Areas (Anchorage, Matanuska-Susitna, Kenai,
13 Ketchikan, and Juneau) for the collection of marine aquatic plants that are naturally dislodged from the
14 substrate.

1 **2000 - COMMAND**

2 During a spill the Unified Command may be involved with additional aspects of the response related to
3 wildlife, such as addressing subsistence concerns or conducting a Natural Resource Damage Assessment
4 and Restoration (NRDAR) effort. The following sections provide information about the intersection of
5 these responsibilities:

6 [2400 - Liaison Officer](#)

7 [2470 - Subsistence Resources](#)

8 [2500 - Natural Resource Damage Assessment and Restoration \(NRDAR\)](#)

9 [2510 - Coordinating Carcass Collections](#)

10 [2520 - Coordinating Marine Debris Response](#)

11 **2400 - Liaison Officer**

12 During a spill response, the ICS position of Liaison Officer is responsible for communicating and
13 coordinating with appropriate stakeholders and for bringing stakeholder concerns to the Unified
14 Command. Subsistence user concerns, including marking of rehabilitated and released oiled wildlife, can
15 be coordinated through the Liaison Officer, as well as Regional Stakeholder Committee concerns and
16 input. Separate from the permanent Incident Management Team (IMT) Liaison Officer, a Tribal Liaison
17 Officer may be assigned by the affected Tribe to participate in the IMT functions and provide continuous
18 Tribal input to the response planning process. Where traditional Tribal lands, subsistence use areas, and
19 subsistence species are concerned, and when Tribal members' economic and social activities are
20 impacted, Tribes are likely to assign this position.

21 **2470 - Subsistence Resources**

22 “Subsistence is sustenance for the life.”³

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

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

36 The specific subsistence foods at risk, impacted, or of concern to subsistence users will determine the
37 appropriate response methods needed to provide food safety information. When available, this
38 information should be included in the assessment of resources at risk (RAR; ICS-232 CG form). Priorities

³ From the Alaska Native Knowledge Network [VALUES of the Unangan/Unangas](#) webpage.

1 of human safety, property, and spill containment may initially limit the additional data that can be
2 collected to inform subsistence food safety concerns.

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

10 Alaska's subsistence users are also concerned about potential impacts to the quality and quantity of
11 subsistence foods after the use of dispersants during a spill response. Communication to the public, and
12 subsistence users in particular, about dispersant use during a spill is recommended. Topics of
13 communication could include the location of dispersant use and anticipated trajectory of oil and
14 dispersants, as well as information regarding the toxicological properties of the dispersant used and its
15 potential health impacts. Dispersants and their use during an oil spill will be addressed through the
16 process outlined in the Alaska RCP (see the *Dispersant Use Plan for Alaska*), available on the ADEC [Spill
17 Prevention and Response](#) webpage.

18 The rescue, rehabilitation, and release of oiled wildlife is an important response activity. All released
19 birds will be banded with typical U.S. Geological Survey (USGS) leg bands. Prior to release into the wild,
20 birds of subsistence species will also receive bands that indicate the bird has been oiled, rehabilitated,
21 and released. Marine mammal marking protocols vary by species, incident, and responsible wildlife
22 agency; agencies will communicate with subsistence users about appropriate marking of oiled,
23 rehabilitated, and released marine mammals. Details on wildlife banding and other information
24 important to subsistence users will be described in the incident-specific release plan (Section IX of the
25 Comprehensive Wildlife Response Plan [WRP]), developed in cooperation with the wildlife agencies,
26 responsible party/potentially responsible party (RP/PRP), rehabilitators, and the Liaison Officer.

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

35 **2500 - Natural Resource Damage Assessment and Restoration (NRDAR)**

36 When oil spills or hazardous substance releases occur, state and federal agencies typically conduct or
37 participate in emergency response activities to minimize impacts. The primary goals of emergency spill
38 response are to contain, control, and collect oil or hazardous substances to protect human health and
39 the environment. Sometimes the extent of environmental damage requires further restoration. When
40 this occurs, natural resource trustees from state and federal agencies may opt to conduct a NRDAR to
41 restore injured resources.

42 If a Unified Command is established for a spill with NRDAR concerns, NRDAR Trustee agencies may
43 collectively appoint a NRDAR Liaison (see the U.S. Coast Guard [USCG] [Incident Management Handbook](#))
44 to represent the NRDAR team in the Unified Command and serve as a conduit for information to/from

1 the Unified Command. However, NRDAR activities are conducted under separate authority and funding
2 from response activities, and the On-Scene Coordinators (OSCs) do not direct the NRDAR.

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

9 See Section 2500 of the Alaska WPG for more information about NRDAR.

10 **2510 - Coordinating Carcass Collections**

11 The Unified Command and NRDAR Trustees have two goals in removing incident-related carcasses from
12 the environment—minimizing secondary contamination of scavengers and providing evidence of
13 environmental harm. However, the methods used, information collected, and disposition of carcasses
14 may differ between the Unified Command and NRDAR Trustees. It is critical that the Unified Command
15 and NRDAR Trustees coordinate any carcass collection plans as early in the incident as possible.

16 See Section 2510 of the Alaska WPG for additional information.

17 **2520 - Coordinating Marine Debris Response**

18 The Unified Command and NRDAR Trustees have a similar goal in removing incident-related oiled
19 marine debris from the environment to minimize the oiling of wildlife and their habitats. However, the
20 methods used and information collected may differ between the Unified Command and NRDAR
21 Trustees. Unified Command and NRDAR Trustees should coordinate on marine debris documentation or
22 collection plans as early in the incident as possible.

23 See Section [3640.2](#) below for additional information.

1 **3000 - OPERATIONS**

2 **3600 - Wildlife Operations**

3 The following sections provide information on wildlife response considerations, protection measures,
4 and activities relevant to the Operations Section:

5 [3610 - Wildlife Response Best Management Practices \(BMPs\)](#)

6 [3620 - General Wildlife Protection Considerations](#)

7 [3630 - Vessel Grounding or Sinking Response](#)

8 [3630.1 - Preventing Rat Introduction to the Pribilof Islands](#)

9 [3630.2 - Entanglement and Fishing Gear](#)

10 [3640 - Wildlife Branch \(WB\)](#)

11 [3640.1 - Wildlife Reconnaissance \(Recon\)](#)

12 [3640.1.1 - Authorizations and Permits for Wildlife Recon](#)

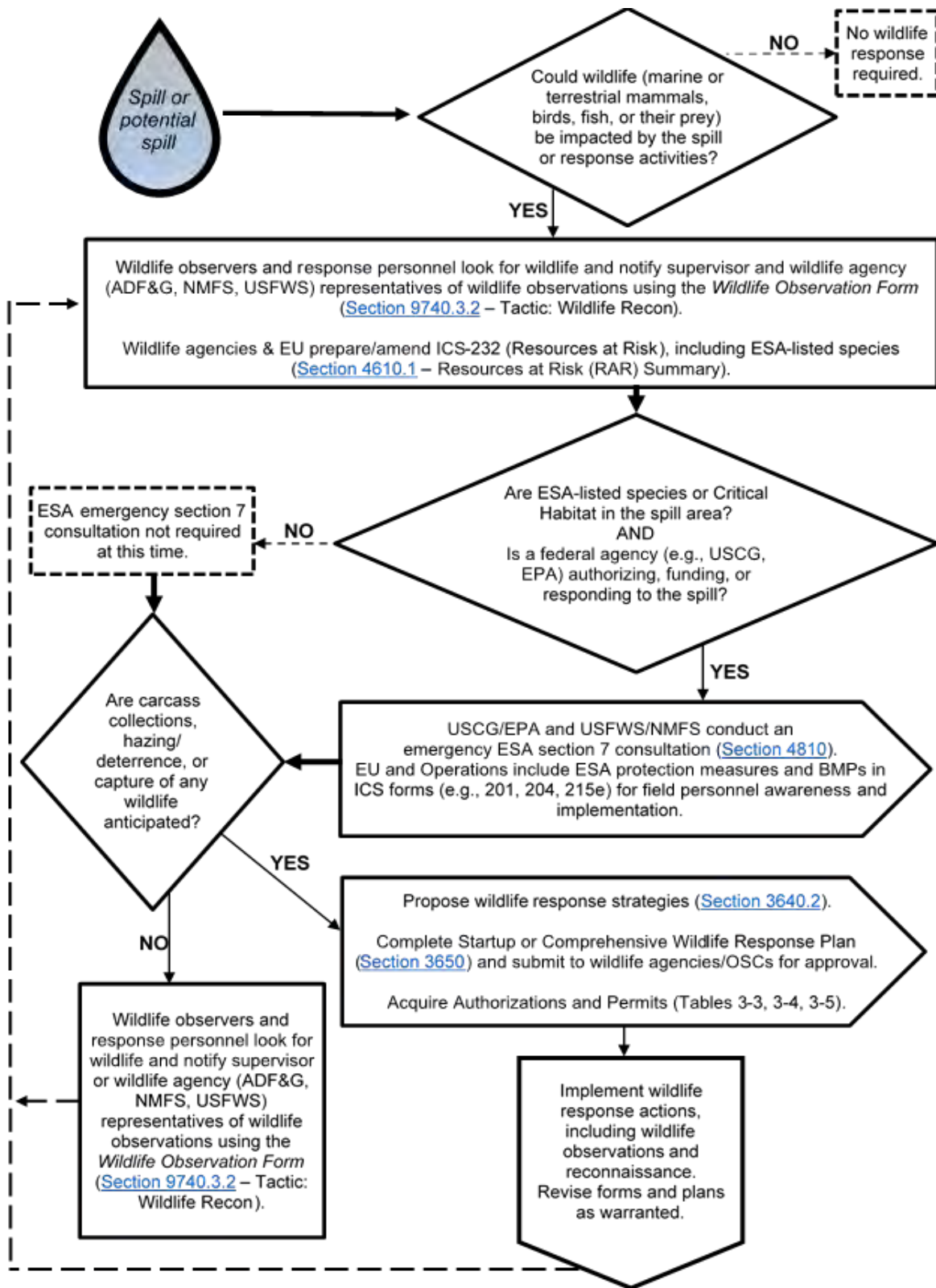
13 [3640.2 - Wildlife Response Strategies](#)

14 [3650 - Request for Wildlife Response Activities](#)

15 [3650.1 - Startup Wildlife Response Plan \(WRP\)](#)

16 [3650.2 - Comprehensive Wildlife Response Plan \(WRP\)](#)

17 [3650.3 - Inadvertent Impacts of Wildlife Response Activities](#)



1
2 Figure 3-1. Wildlife response flow chart for major wildlife response decisions, agency notifications, and
3 initial forms/applications (reproduced from the Alaska WPG).

1 **3610 - Wildlife Response Best Management Practices (BMPs)**

2 As outlined in Section 4610.2 of the Alaska WPG, field activities associated with oil spills have the
3 potential for causing unnecessary and unauthorized disturbance to sensitive migratory bird species,
4 marine mammals, and their habitats. To reduce disturbance and improve the chances for wildlife
5 survival, USFWS, NMFS, or ADF&G representatives (as appropriate) will reiterate, through the Federal
6 Aviation Administration (FAA) and the Federal OSC (FOSC), the importance of following existing notices
7 to aircraft currently in place for the Pribilofs. Current advisories request pilots to remain at a certain
8 distance from migratory bird concentration areas and sensitive habitats, such as seabird cliffs, and may
9 be occasionally updated as supplements. Information on aircraft advisories for Saint Paul and St. George
10 Islands, respectively, may also be found on Environmentally Sensitive Areas maps for the [Pribilof Islands](#)
11 on NOAA’s Environmentally Sensitive Index webpage (scroll down to Alaska, Pribilof Islands). The most
12 up to date information on aircraft advisories can also be found at this FAA site with [Flight Advisories for](#)
13 [Wildlife Sensitive Areas](#).

14 In addition, wildlife agency representatives will provide guidance to mariners and response personnel on
15 actions they can take to minimize impacts to wildlife, such as remaining at a certain distance from
16 migratory bird or marine mammal concentration areas and sensitive habitats, including seabird cliffs or
17 northern fur seal haulouts.

18 Copies of advisories or guidance will be distributed to responders through the Unified Command or
19 OSCs. If warranted, a news release will be prepared by the appropriate wildlife agency representatives
20 on this subject for distribution by the Unified Command or OSCs to appropriate news media
21 representatives.

22 Wildlife response Best Management Practices (BMPs) were developed as measures to reduce impacts to
23 wildlife and their habitats during an oil spill response and for responder safety. These should be
24 considered general guidance during spill responses. Not all BMPs will be applicable to every response,
25 which is why incident-specific guidance is developed through the ESA section 7 consultation process and
26 the Startup and Comprehensive WRPs. The best available information and professional judgment should
27 be used when determining how to implement these BMPs during each response. Wildlife Response
28 BMPs are available in Section [9700](#) and as a standalone document on the [ADEC Area Plan References](#)
29 [and Tools](#) webpage.

30 **3620 - General Wildlife Protection Considerations**

31 Sections 3620 and 4610.2 in the Alaska WPG contain information on general wildlife protection
32 considerations, such as the prevention of:

- 33 • Introducing Rats to “Rat-Free” Islands
- 34 • Unnecessary or Illegal Disturbance to Sensitive Species and Habitats
- 35 • Collection of Wildlife Parts for Personal Use
- 36 • Wildlife Exposure to Shoreline Treatment Chemicals

37 General wildlife protection considerations as they relate to the Planning Section can be found below in
38 Section [4610.2](#).

39 **3630 - Vessel Grounding or Sinking Response**

40 In addition to creating a potential spill, the sinking or grounding of a vessel presents unique challenges
41 for wildlife protection. Section 3630 in the Alaska WPG includes information on the following topics:

- 42 • [3630.1 - Preventing Rat Introduction to the Pribilof Islands](#)

- 1 • [3630.2 - Entanglement and Fishing Gear](#)
- 2 • 3630.3 – Disposal of On-Board Catch
- 3 • 3630.4 – Preventing Spread of Invasive Species Other than Rats
- 4 • 3630.5 – Preventing Impacts to Wildlife and Habitats during Vessel Removal, Salvage, or
- 5 Scuttling

6 Pribilof Islands-specific information is included in section [3630.1](#) and [3630.2](#) of this document. See
7 sections 3630.2 through 3630.5 of the Alaska WPG for information on the other topics.

8 The *Checklist: Vessel Grounding or Sinking Response* can be used by response personnel as an aid to
9 protect wildlife during vessel groundings and sinkings. The checklist can be found in Section [9700](#) or as a
10 standalone document on the [ADEC Area Plan References and Tools](#) webpage.

11 **3630.1 - Preventing Rat Introduction to the Pribilof Islands**

12 State of Alaska law (5 AAC 92.141) prohibits the transport, harboring, or release of specific live rodents,
13 including the Norway rat, the roof rat, and the house mouse. The Norway rat is typically of greatest
14 concern because the species has a wide distribution, and rats are excellent swimmers.

15 Many cities, towns, and some remote islands ([Table 3-1](#)) in Alaska have known populations of breeding
16 rats, but the Pribilofs are rat free. There are rigorous rat prevention programs in place on both islands
17 through local entities. Invasive rats are a significant concern for the Pribilof Islands because of the
18 devastation that introduced rats can cause on island ecosystems, including direct predation of nesting
19 seabirds and seasonally endemic birds, as well as the introduction of disease to marine and terrestrial
20 mammals. Nesting seabirds are especially vulnerable to impacts from rats because seabirds nest
21 primarily on the ground or in burrows, and adult foraging behavior leaves eggs and young unattended
22 for several hours to days. Rats are extremely difficult and expensive to eradicate, and eradication may
23 not be possible after rats are established on an island or at a remote location.

24 Table 3-1. Islands in the Alaska Maritime NWR known to have rats. All other islands in the Alaska
25 Maritime NWR should be considered rat free.

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

26 All vessels operating in the vicinity of the Pribilofs should follow the *Rat Prevention Guidelines for*
27 *Vessels* in Section [9740.4.6](#). Even with strict adherence to these guidelines, rats can access shorelines
28 from grounded vessels or vessels sinking close to shore, and rats can drift to shore on vessel debris.
29 Stricken vessels should be examined for evidence of rats by USFWS representatives (or their designees)
30 if it is possible and safe to do so. If rats are known or suspected to be onboard the vessel, USFWS
31 representatives or individuals on the Pribilofs certified to use rodent poisons should deploy rodent traps
32 on the vessel and poisons in the vicinity of the vessel prior to or after the vessel grounding. A list of rat
33 prevention equipment and materials currently stockpiled on the Pribilofs is provided in [Table 3-2](#). Island
34 Sentinels with the Aleut Community of St. Paul Ecosystem Conservation Office (ECO) maintain
35 rodenticide applicator certifications and can assist when needed (see WILDLIFE CONTACTS section for
36 contact information). ECO, in partnership with the Alaska Maritime NWR, Conservation International,

1 and the State of Alaska, has a Rat Prevention and Response Plan that may be consulted to assist with
 2 rodent eradication during an oil spill or vessel grounding emergency.

3 Table 3-2. Rat prevention equipment and materials stockpiled on the Pribilof Islands*

Location	Type of Kit	Owner	Contact Information
Saint Paul Island National Marine Fisheries Service GARCO warehouse	1 Shipwreck Kit	USFWS	Paul Melovidov, Aaron Lestenkof, Lauren Divine Tribal Govt. of St. Paul (Wk) 907-546-3200/3226 (Cell) 907-546-4030 (Paul) (Cell) 907-891-3031 (Lauren)
Saint Paul Island Tribal Government of St. Paul Office	Rat Station Supplies	Tribal Government of St. Paul	Paul Melovidov, Aaron Lestenkof, Lauren Divine Tribal Govt. of St. Paul (Wk) 907-546-3200/3226 (Cell) 907-546-4030 (Cell) 907-891-3031 (Lauren)
St. George Island Cottage C	1 Shipwreck Kit	USFWS	Mark Mercurief, Jr. (Wk) 907-859-2447 (Hm) 907-859-2324 Cottage C: 907-859-2233
* Each individual identified in this table is also required to have a rodenticide applicator license. Certification is valid for one, two, or three years depending on test scores.			

4 Response vessels or aircraft could also inadvertently transport rats to rat-free areas, so vessels and
 5 aircraft should be examined for evidence of rats before deployment. In addition to the *Rat Prevention*
 6 *Guidelines for Vessels* (Section [9740.4.6](#)), the USFWS and ADF&G can provide guidance and assistance in
 7 finding resources to examine boats and planes for rats.

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

13 Additional information on rats, including ways to prevent their introduction, can be found on the
 14 following webpages:

- 15 • ADF&G [Invasive Species — Norway Rat \(*Rattus norvegicus*\)](#)
- 16 • [StopRats.org](#) Rats on Boats

17 **3630.2 - Entanglement and Fishing Gear**

18 General information about entanglements and fishing gear from vessel sinkings or groundings can be
 19 found in Section 3630.2 of the Alaska WPG. Section [3630.1](#), below, provides more detailed information
 20 about responding to marine debris associated with vessel groundings and sinkings, including fishing
 21 gear.

1 **3630.2.1 - Marine Debris Response**

2 Marine debris released during a vessel grounding or sinking may impact wildlife in a number of ways,
3 such as creating entanglement hazards and introducing plastic to the environment which may be
4 ingested, and floating debris which can transport rats to rat-free areas (see Section [3630.1](#)). To prevent
5 such impacts, the removal of marine debris should be considered during the response to a grounded or
6 sinking vessel.⁴

7 Alaska State law prohibits abandonment of grounded vessels; vessel owners are responsible for their
8 vessel and all items on board (Alaska Statute § 30.30.010). In addition, marine debris poses an
9 entanglement risk that could lead to unauthorized injury or mortality. More specifically, the MMPA and
10 ESA prohibit harm and harassment of marine mammals and species listed under the ESA. Entangling
11 materials from grounded or sunken vessels should be removed from the marine and coastal
12 environment as soon as possible to avoid harmful and lethal interactions between wildlife and synthetic
13 gear.

14 The National Oceanic and Atmospheric Administration (NOAA) and the USCG define marine debris as
15 “any persistent solid material that is manufactured or processed and directly or indirectly, intentionally
16 or unintentionally, disposed of or abandoned into the marine environment or the Great Lakes.”⁵ Two
17 common types of marine debris associated with vessel grounding and sinking include plastic (such as
18 consumer product containers, plastic bags, food wrappers, and cigarette butts) and derelict fishing gear.
19 The size of marine debris ranges from the smallest plastic pieces (microplastics; generally too small to be
20 seen with the human eye) to the entirety of a grounded or sunken vessel. Though some debris may
21 eventually break down, many items (such as microplastics) may never completely disappear.

22 The sinking or grounding of vessels can result in the release of fishing gear, supplies, and trash into the
23 marine environment. Fishing vessels can release items like crab pots, nets, hooks, rope, and line which
24 will continue to “ghost” fish at sea and can entangle marine life for decades. As fish or shellfish become
25 entangled, they become attractants to other wildlife. Air-breathing wildlife, such as marine mammals
26 and birds, can subsequently become entangled. Entanglement can cause lacerations, exhaustion,
27 starvation, and drowning or asphyxiation of wildlife. Fixed gear, such as longlines and pots, also
28 entangles wildlife, causing injury and mortality. Gear that remains in the coastal and marine
29 environment after a vessel grounding or sinking will degrade into smaller pieces over time and continue
30 to damage the ecosystem long after the initial emergency response concludes.

31 ***3630.2.1.1 - Marine Debris Removal Priorities and Protocols***

32 The removal of marine debris during a spill response can prevent additional impacts to wildlife and is
33 also essential for accounting of items onboard vessels. Furthermore, the removal of marine debris aligns
34 with MARPOL Annex V and related statutes, which prohibit the pollution of the marine environment
35 with waste such as plastic.

36 During a vessel grounding or sinking, responders should identify potential sources of marine debris
37 onboard the vessel and prioritize debris for removal when it is safe to do so.

38 Marine debris removal priorities and protocols, as safety and practicality allow, are:

- 39 1. Retrieve marine debris that has detached from the vessel in nearby waters or shorelines.

⁴ All references to debris and marine debris in this document are specific to non-oiled debris. Information about the collection and disposal of oiled debris can be found in the AWA ACP.

⁵ Source: <https://marinedebris.noaa.gov/discover-marine-debris/what-marine-debris>

- 1 • Determine if any gear, especially fishing nets, is in the water and still attached to the
2 vessel. Remove or secure.
- 3 • Examine vessel and the nearby seafloor for fishing gear, lines, and associated synthetic
4 materials. Remove or secure.
- 5 2. Remove or secure all loose gear, particularly plastics, from the vessel compartments and decks.
 - 6 • Survey the shorelines and waters immediately surrounding the vessel and collect loose
7 items.
 - 8 • Survey the deck and remove or secure gear that is loose or could become loose (in
9 particular nets, loops, and lines) and cause wildlife entanglements.
 - 10 • Survey remaining compartments, such as the galley, berthing areas, and holds, and
11 remove or secure gear that is loose or could become loose.
- 12 3. Retrieve actively deployed fishing gear associated with the vessel, such as pots or longlines.
 - 13 • Determine from the persons onboard if fishing gear was deployed.
 - 14 • Work with the vessel owner or the appropriate fishery management agency for a plan to
15 retrieve the gear.

16 During a marine debris response, the following steps should be taken to ensure marine debris priorities
17 are met:

18 1. Initial Marine Debris Retrieval and Documentation

19 During the initial response, responders should record and photograph all items of marine debris
20 retrieved. The documentation should be provided to the Unified Command.

21 2. Monitor Debris and Wildlife

22 During Wildlife Reconnaissance (see Section [3640.1](#)) throughout the response, Wildlife Observers will
23 monitor the spill area. To reduce the risk of entanglement in or ingestion of marine debris, incident-
24 specific reconnaissance protocols may be developed, particularly if large amounts of debris, high
25 concentrations of wildlife, or rare species are present.

26 a. Report Impacts

27 Wildlife Observers and other responders should report to their supervisor any oiled debris or debris that
28 could become an entanglement or ingestion hazard, such as nets, lines, loops, plastics, and beaded
29 Styrofoam. Entanglement and ingestion hazards should be prioritized for removal. Oiled debris should
30 be removed as oily waste.

31 All responders should immediately report wildlife entanglements to their supervisor or the
32 Environmental Unit (EU). Untrained responders should not attempt to release entangled wildlife. It
33 could be dangerous for the responders and cause more stress or injury to the animal.

34 b. Respond to Wildlife

35 A response to wildlife entangled or harmed by debris should be conducted by trained wildlife
36 responders only, such as those trained in the northern fur seal disentanglement protocol used on the
37 Pribilof Islands.

38 3. Marine Debris Removal Throughout the Response

1 It is likely that responders will not address all marine debris concerns during the initial response. For this
2 reason, continued monitoring of the nearby waters, shoreline, and wildlife for marine debris should
3 continue throughout the spill response.

4 a. Establish a Marine Debris Baseline

5 To determine if debris found onshore can be attributed to the RP, a baseline of marine debris presence
6 in the area should be established. The Aleut Community of St. Paul Island and [NOAA Marine Debris](#)
7 [Program](#) have a long history of beach cast marine debris cleanups and have extensive data on deposition
8 and reaccumulation of debris.

9 b. Remove Debris from Shorelines and Surrounding Waters

10 The Unified Command will determine which shorelines are most likely to be contacted by debris
11 originating from the vessel. The Unified Command will develop and prioritize a strategy for removing
12 debris from these affected shorelines. This may include shoreline transects for identification and
13 classification of debris, and protocols for the removal of specific types of debris.

14 In addition, the Unified Command will approve the best strategy for removing debris from the water.
15 This may include the use of a vessel to retrieve debris from the water, and protocols for the removal of
16 specific types of debris, such as fishing lines and nets.

17 If debris is oiled, responders must follow protocols for the removal or cleaning of the debris.

18 c. Storage of Recovered Marine Debris

19 Once recovered, debris should be stored in a secure location until a marine debris disposal plan is
20 developed by the Unified Command.

21 **3640 - Wildlife Branch (WB)**

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

- 27 • Conduct all operations in a safe manner for people and wildlife.
- 28 • Respond to oiled, entangled, or otherwise injured wildlife.
- 29 • Minimize injuries to wildlife and habitats from contamination.
- 30 • Minimize injuries to wildlife and habitats from the cleanup effort.
- 31 • Collect all data, samples, and wildlife in a legally defensible manner.
- 32 • Document the immediate impacts to wildlife from the oil spill and cleanup.
- 33 • Report to the Unified Command (via the Operations Section Chief) all pertinent data and
34 information necessary to prioritize wildlife response operations.
- 35 • Support the efforts of the Joint Information Center (JIC) in disseminating information to the
36 media, public, and other stakeholders and interested parties.
- 37 • Provide the best achievable care to impacted wildlife.

38 To ensure these objectives are achieved with maximum efficiency, the WBD (in coordination with the
39 EU) coordinates the activities of the federal, state, and local agencies along with wildlife response

1 organizations that are under the authority of the Unified Command during spill response. Early
2 development and implementation of a WRP ensures timely mobilization of dedicated staff, equipment,
3 and facilities. The wildlife response effort should be flexible and scalable to the size of the oil spill; only
4 those positions necessary and appropriate for a specific incident are filled.

5 Wildlife contractors may be deployed depending on the region and risk. Once the Unified Command
6 activates the WB, several components of wildlife response can be initiated, including reconnaissance to
7 determine species and areas at greatest risk; feasibility of wildlife hazing/deterrence; search for and
8 collection of live and dead animals; treatment and rehabilitation of oil exposed wildlife; and release and
9 monitoring of rehabilitated wildlife.

10 The process for obtaining permits and authorizations is provided below in Section [3650](#).

11 **3640.1 - Wildlife Reconnaissance (Recon)**

12 Wildlife Recon is typically initiated before any other wildlife protection strategies (Section [3640.2](#)) and is
13 continued in concert with those strategies. The *Tactic: Wildlife Reconnaissance (Recon)* is available in
14 Section [9740.4.2](#) and specific resources for wildlife recon in the Pribilof Islands are described in Section
15 [3640.1.2](#).

16 It is the WBD's and RP/PRP's responsibility to understand and implement the necessary coordination
17 with wildlife agencies for proper application of the tactic. If no WB is established, the Unified Command
18 must coordinate with the EU to ensure sufficient wildlife recon occurs. A permitting summary is
19 provided in Section [3640.1.1](#).

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

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

30 Wildlife recon can be performed by any spill responder, especially in the first 24 to 48 hours (before
31 dedicated wildlife responders usually arrive on scene). Wildlife Observers will be deployed based on spill
32 conditions, location, and species likely to be present. Anyone can use the *Wildlife Observation Form*
33 ([Figure 9-1](#)) to record and summarize observations.

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

- 36 1. **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales, 5
37 seals)
- 38 2. **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out,
39 floating/sitting in the water, transiting in a northerly direction)

- 1 3. **Where are they?** (preferably latitude/longitude, but could also be a description, e.g.,
2 “nearshore/shoreline approximately 1 kilometer from oil, in [name of] Bay”)
- 3 4. **Other relevant details** (e.g., degree of oiling, age class, sex)
- 4 5. **Photos and video** are very helpful

5 **Wildlife Observers** (a specific position within the ICS and described in more detail below) will follow an
6 incident-specific wildlife observation protocol (generally developed by the wildlife agencies). The *Tactic:*
7 *Wildlife Reconnaissance (Recon)* (Section [9740.4.1](#)) is a generic protocol that can be adapted for specific
8 incidents. Incident-specific protocols should be scaled appropriately for the size and location of the
9 incident and should include more detail on species most likely to be in the area and ESA-listed or other
10 protected species. The skills and duties of Wildlife Observers differ from those of first responders
11 conducting initial wildlife recon and all other responders. A Wildlife Observer’s sole duty is to observe,
12 record, and report information on wildlife.

13 Wildlife Observers must:

- 14 1. Be proficient at identifying marine and terrestrial mammals and birds to species (or species
15 group for some birds) for species likely to be in the area, especially ESA-listed wildlife.
- 16 2. Not be assigned any other duties, such as Shoreline Cleanup Assessment Technique (SCAT)
17 teams, maintaining boom, or overseeing skimming operations.

18 **3640.1.1 - Authorizations and Permits for Wildlife Recon**

19 No specific permits are needed for incidental wildlife observations made by responders. Wildlife
20 Observer activities (e.g., aerial or boat-based surveys) may need permits for incidental disturbance of
21 protected species, such as hauled-out seals or sea lions (see [Table 3-3](#) and [Table 4-1](#)). In all cases,
22 avoidance of unnecessary disturbance to wildlife while conducting surveys is important and must be
23 included in incident-specific protocols.

24 **3640.1.2 - Resources for Wildlife Recon on the Pribilof Islands**

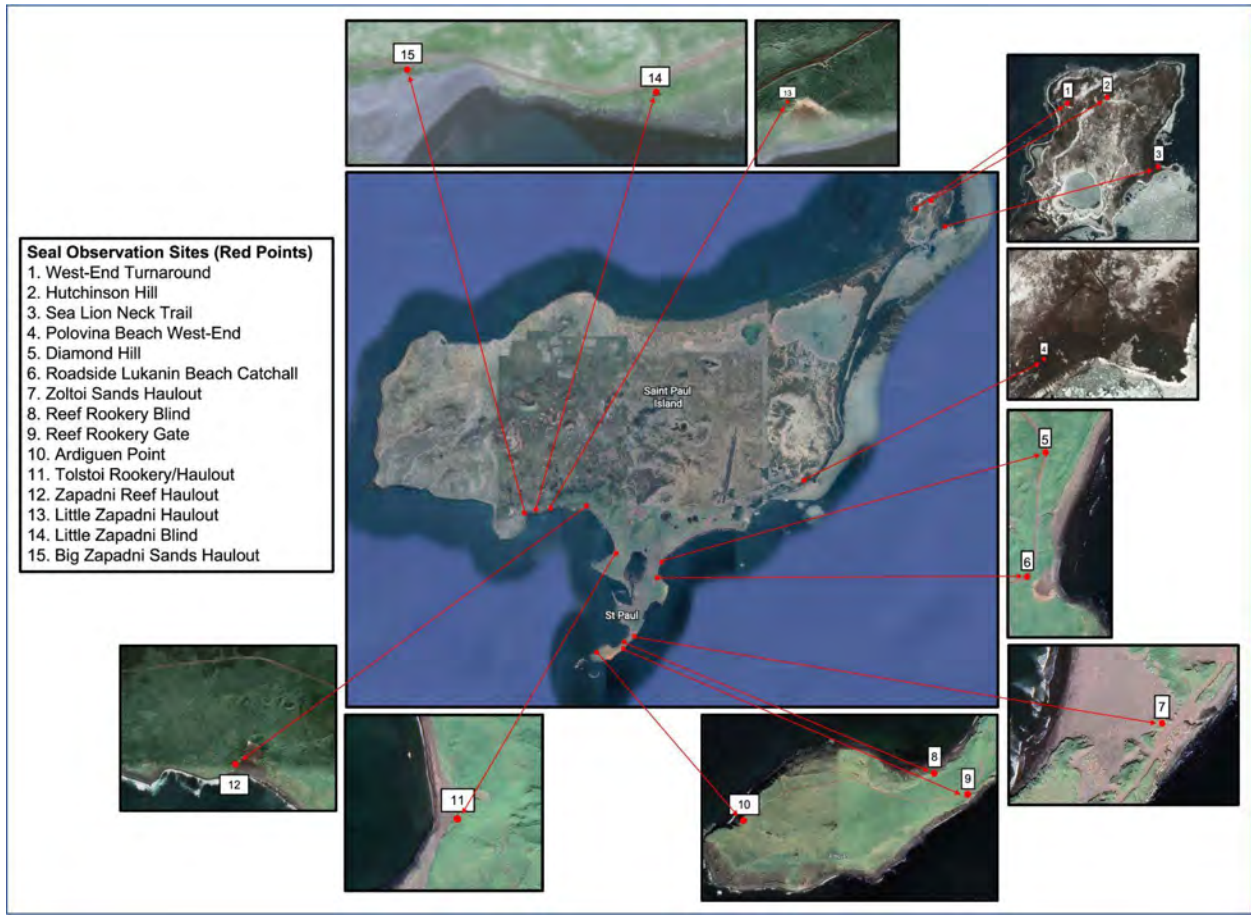
25 There are several sources of information available to assist personnel conducting wildlife observations
26 on the Pribilof Islands. Species lists for migratory birds and marine mammals can be found in sections
27 [9740.3](#) and [9740.3.2](#), respectively. The ECO Sentinel Program can provide specific information about the
28 presence of species.

29 The use of uncrewed aircraft systems (drones or UAS) and other types of remote monitoring often
30 require different types of permits, authorizations, and procedures. The use of UAS during spill response
31 should follow the AWA ACP’s *Protocol for Using Unmanned Aircraft Systems (UAS)* during an Oil Spill
32 Response or Exercise, available on the [ADEC Area Plan References and Tools](#) webpage. This protocol
33 includes guidelines on the operation of UAS to minimize disturbance to wildlife. ECO also holds NMFS
34 scientific research permit #23896 (effective dates: October 2021 - September 2026) as part of their
35 marine mammal co-management agreement that allows pilots to use UAS at an altitude of 150 feet or
36 higher above marine mammals.

37 The Aleut Community of St. Paul Island Tribal Government’s ECO staff have six FAA Part 107 certified
38 pilots capable of piloting UAS ([Table 3-3](#)). ECO has a fleet of small UAS, including two DJI Phantom 4 Pro
39 V2.0 aircraft that can be used for wildlife reconnaissance during an oil spill response as weather
40 conditions allow. At this time, UAS cannot be launched from NWR System lands (i.e., the Alaska
41 Maritime NWR). All UAS operations will be coordinated through the Air Operations Branch of the
42 Operations Section.

1 Table 3-3. Certified UAS pilots in the Aleut Community of St. Paul Island Tribal Government’s Ecosystem
 2 Conservation Office.

Name	Position	Contact
Lauren Divine	Director, ECO	lmdivine@aleut.com
Veronica Padula	Assistant Director, ECO	vmpadula@aleut.com
Aaron Lestenkof	Island Sentinel, ECO	aplestenkof@aleut.com
Chris Tran	Natural Resources Specialist, ECO	cctran@aleut.com
Hanna Hellen	Environmental Program Manager, ECO	hhellen@aleut.com



3
 4 Figure 3-2. Land-based observation locations on Saint Paul Island. Red lines/dots indicate pre-existing
 5 observation points for northern fur seals.



1
 2 Figure 3-3. Land-based observation locations on Saint Paul Island. Yellow lines/dots indicate pre-existing
 3 observation points for seabirds (typically high cliff points).

4 **3640.2 - Wildlife Response Strategies**

5 The Alaska WPG provides detailed information about the primary, secondary, and tertiary response
 6 strategies and the authorizations and permits that may be obtained to implement them. Below is a
 7 general overview.

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

- 10
- Primary Strategies: Keep the spilled oil away from wildlife and their habitats – Controlling the
 11 release and spread of spilled oil and removal of oiled debris, including oiled carcasses, from the
 12 environment.

- 1 • Secondary Strategies: Keep wildlife away from spilled oil – Hazing/deterring wildlife from oiled
2 areas to unoiled areas, and pre-emptive capture, handling, transport, and release of unoiled
3 wildlife.
- 4 • Tertiary Strategies: Respond to impacted wildlife – Capture, handling, transport, stabilization,
5 cleaning, rehabilitation, holding, and release of oiled or injured wildlife.

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

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

14 Tertiary response strategies are “last resort” strategies, and include capture, handling, stabilizing,
15 transporting, rehabilitating, and holding of oiled wildlife, as well as releasing rehabilitated wildlife.
16 Implementation of most wildlife response strategies will require permits or authorizations.

17 The process for obtaining permits and authorizations is provided below in Section [3650](#). Species-specific
18 information for primary, secondary, and tertiary wildlife response strategies is in Section [9740.2](#).

19 [3650 - Request for Wildlife Response Activities](#)

20 During an oil spill response when wildlife is or could become oiled, some or portions of the wildlife
21 response strategies may need to be implemented before all the details necessary to carry out entire
22 strategies are available. A two-phase process allows initial wildlife response strategy implementation as
23 soon as possible using the Startup WRP (Section [9740.4.8.1](#)) and allows additional details to be added in
24 the Comprehensive WRP (Section [9740.4.8.2](#)) as the spill response continues. This two-phase process
25 allows time to:

- 26 • Scale the IMT wildlife sections (EU, WB) to the size appropriate for the incident.
- 27 • Mobilize wildlife responders.
- 28 • Conduct immediate authorized response activities for impacted wildlife.⁶
- 29 • Develop details necessary to complete the Comprehensive WRP.

30 Details about the Startup and Comprehensive WRPs can be found in Sections [3650.1](#) and [3650.2](#),
31 respectively. The Startup and Comprehensive WRP forms are in Section [9740.4.8](#). Both forms include
32 requests to conduct primary, secondary, and tertiary response strategies, except for pre-emptive
33 capture which is not included in the Startup WRP. The Startup WRP is an abbreviated version of the
34 Comprehensive WRP ([Table 3-4](#)).

⁶ 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., as carcass collection does).

1 Table 3-4. Comparison of Startup and Comprehensive Wildlife Response Plans (WRPs) for Oil Spill
 2 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 the Unified 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 by 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 procedures).

3 **3650.1 - Startup Wildlife Response Plan (WRP)**

4 The Startup WRP (Section [9740.4.8.1](#)) is a request to begin the process of authorizing and implementing
 5 all or some portion of wildlife response strategies to be conducted for up to 72 hours after the start of a
 6 spill. Wildlife response activities approved in the Startup WRP (including carcass collection, hazing/
 7 deterrence, or capture and rehabilitation) will not be authorized beyond 72 hours after the start of the
 8 spill (unless the same activities have been included in an approved Comprehensive WRP—see below).
 9 Upon approval by the wildlife agencies, the Startup WRP should be submitted to the OSCs for their
 10 approval and for inclusion in the next Incident Action Plan (IAP).

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

16 See Section 3650.1 of the Alaska WPG for more information about WRPs.

17 **3650.2 - Comprehensive Wildlife Response Plan (WRP)**

18 A Comprehensive WRP approved by the wildlife agencies is needed for activities conducted beyond 72
 19 hours following the start of a spill. The Comprehensive WRP (Section [9740.4.8.2](#)) should be completed
 20 and approved by the wildlife agencies and the Unified Command before any carcass collection,
 21 hazing/deterrence, pre-emptive capture, or capture and rehabilitation activities begin or before the
 22 Startup WRP expires. The Comprehensive WRP can be amended if substantially new wildlife response
 23 activities are proposed.

24 Following approval by the wildlife agencies, the Comprehensive WRP should then be submitted to the
 25 Federal and State OSCs for their approval and inclusion in the next IAP.

26 See Section 3650.1 of the Alaska WPG for more information about WRPs.

27 **3650.3 - Inadvertent Impacts of Wildlife Response Activities**

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

1 seabirds conducted near a northern fur seal rookery could cause the fur seals to flush into the water,
2 become oiled, or crush pups.

3 Responders must have a full understanding of authorized and unauthorized activities (and any
4 conditions attached to authorizations) to minimize incidental impacts. Restrictions or other conditions
5 may come from stipulations in permits or LOAs, protection measures from ESA section 7 consultations,
6 and information provided in the Startup or Comprehensive WRPs. The EU Lead should be proactive
7 about compiling this information and providing it to the WB and field responders. In turn, field
8 responders should relay important information and observations to the IMT and wildlife agency
9 representatives regarding the presence of wildlife and incidental impacts to wildlife from response
10 activities.

1 **4000 - PLANNING**

2 **4600 - Environmental Unit (EU)**

3 Within the Planning Section, the EU is responsible for wildlife considerations during the planning of spill
4 response activities.

5 Additional information on wildlife response issues as they relate to the Operations Section can be found
6 above in Section [3600](#).

7 **4610 - Planning Activities for Fish and Wildlife Protection**

8 The following sections summarize information on the following wildlife response planning
9 considerations, relevant to the EU within the Planning Section:

10 [4610.1 - Resources at Risk \(RAR\) Summary](#)

11 [4610.2 - General Wildlife Protection Considerations](#)

12 [4610.3 - Wildlife Standards of Response](#)

13 [4610.4 - Wildlife Response Strategies](#)

14 Information related to the correspondence, permits, and consultation to implement wildlife response
15 strategies can be found in Section [4800](#).

16 See the same sections of the Alaska WPG for more information.

17 **4610.1 - Resources at Risk (RAR) Summary**

18 The RAR Summary (form ICS 232-CG; available on the USCG [CG-612 Directives and Publications Division](#)
19 webpage) identifies incident-specific priorities and issues and provides information about species,
20 ecosystem services, and sites in the incident area that are sensitive due to environmental, archaeo-
21 cultural, or socioeconomic resource concerns. The RAR Summary is prepared by the EU Leader with
22 input from natural and cultural resource agencies. This form should be reviewed and updated prior to
23 the Tactics Meeting for each Operational Period.

24 See Section 4610.1 of the Alaska WPG for more information, including sources to consider when
25 preparing a RAR summary.

26 **4610.2 - General Wildlife Protection Considerations**

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

29 Recommendations include, but are not limited to, actions to prevent:

- 30 • The introduction of rats to rat-free islands (Section [4610.2.1](#)).
- 31 • Unnecessary or illegal disturbance to sensitive species and habitats, such as nesting raptors,
32 seabird rookeries, and marine mammal haulouts and pupping areas (Section [4610.2.2](#)).
- 33 • Illegal collection of wildlife parts by response personnel (Section [4610.2.4](#)).
- 34 • Wildlife exposure to cleaning agents and bioremediation substances used for shoreline
35 rehabilitation (Section [4610.2.4](#)).

36 General considerations for wildlife protection, as they relate to the Operations Section, can be found in
37 Section [3620](#).

1 **4610.2.1 - Preventing Rat Introduction to Rat-Free Islands**

2 Many cities, towns, and some remote islands in Alaska have known populations of breeding rats, but the
3 Pribilof Islands are rat free. Invasive rats are a significant concern on the Pribilofs because of the
4 devastation introduced rats can cause on island ecosystems, including direct predation of nesting
5 seabirds and seasonally endemic birds, as well as the introduction of disease to marine mammals and
6 terrestrial mammals. Nesting seabirds are especially vulnerable to impacts from rats because seabirds
7 nest primarily on the ground or in burrows, and adult foraging behavior leaves eggs and young
8 unattended for several hours to days. Rats are extremely difficult and expensive to eradicate, and
9 eradication may not be possible after rats are established on an island or at a remote location.

10 Rats can access shorelines from grounded vessels or vessels sinking close to shore, and rats can drift to
11 shore on vessel debris. In addition, response vessels or aircraft could inadvertently transport rats to rat-
12 free areas. Response personnel can use the *Checklist: Vessel Grounding or Sinking Response* in Section
13 [9740.4.5](#) as an aid to protect wildlife during vessel groundings and sinkings.

14 All vessels operating in the vicinity of the Pribilofs should follow the *Rat Prevention Guidelines for*
15 *Vessels* in Section [9740.4.6](#). Stricken vessels should be examined for evidence of rats, if possible and safe
16 to do so. Vessels associated with spill response activities should also be examined for rats. The USFWS
17 and ADF&G can provide additional guidance and assistance in finding resources to examine boats and
18 planes for rats.

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

24 See Section [3630.1](#) for additional information about keeping the Pribilof Islands rat free.

25 **4610.2.2 - Preventing Unnecessary or Illegal Disturbance to Sensitive Species and Habitats**

26 During a spill response, wildlife resource agencies will work with ECO, city governments, and others as
27 appropriate, to evaluate and minimize the potential for response activities to negatively affect wildlife
28 and their habitats. Wildlife resource agencies may recommend to the Unified Command that response
29 activities in or adjacent to sensitive species or areas be completed prior to or following critical biological
30 periods. If that is not possible, wildlife resource agencies may further recommend that on-site wildlife
31 observers accompany near-shore and shore-based activities to help minimize or eliminate unnecessary
32 disturbance or harm.

33 See Section 4610.2.2 of the Alaska WPG for additional information regarding how the Unified Command
34 and wildlife agencies can work together to prevent unnecessary and unauthorized disturbance to
35 sensitive species and habitats.

36 **4610.2.3 - Preventing the Collection of Wildlife Parts for Personal Use**

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

43 **4610.2.4 - Preventing Wildlife Exposure to Shoreline Treatment Chemicals**

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

8 **4610.3 - Wildlife Standards of Response**

9 To ensure oiled wildlife is responded to appropriately, standards have been developed for response to
10 some species or species groups. See Section 4610.3 of the Alaska WPG for the standards of response for:

- 11 • Migratory birds
- 12 • Marine mammals under NMFS's jurisdiction in Alaska (Appendix [9740.6](#))
- 13 • Sea otters in Alaska

14 **4610.4 - Wildlife Response Strategies**

15 In an actual or potential oil spill, Federal and State OSCs will receive input from wildlife agency
16 representatives to protect wildlife and their habitats. Though wildlife protection strategies are discussed
17 in-depth in *Operations* (Section [3000](#)), it is important that both Operations/WB and Planning/EU staff
18 are familiar with these strategies.

19 The following sections provide general information about:

20 [4610.4.1 - Primary Response Strategies](#)

21 [4610.4.2 - Secondary Response Strategies](#)

22 [4610.4.3 - Tertiary Response Strategies](#)

23 See Sections [9740.2](#) and [9740.3](#) for more detailed information about response strategies for marine
24 mammals and migratory birds, respectively.

25 **4610.4.1 - Primary Response Strategies**

26 Primary response strategies emphasize controlling the release and spread of spilled oil at the source to
27 prevent or reduce contamination of potentially affected species and their habitats. Primary response
28 includes strategies such as mechanical cleanup, on-water recovery, protective booming, *in situ* burning,
29 and dispersant use. The removal of oiled debris and oiled wildlife carcasses, both in water and on land,
30 are also primary response strategies.

31 Both oiled and unoiled carcasses in the vicinity of a spill will need to be removed from the environment
32 as soon as possible to minimize, or prevent, secondary contamination of scavengers. The collection of
33 oiled wildlife carcasses will need to be performed, as described in Section 3630.2.1.1 of the Alaska WPG.

34 See Section 4610.4.1 of the Alaska WPG for authorization and permit requirements for primary response
35 strategies.

36 To request approval for the collection of carcasses, responders should fill out a Startup or
37 Comprehensive WRP (Section [3650](#); Section [9740.4.8](#)) and submit it to the wildlife agencies.

1 **4610.4.2 - 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).

7 Only authorized and trained personnel may conduct these activities. See the Secondary Response
8 Strategies (Section 3640.2.2) of the Alaska WPG for detailed information. Refer to Section 4610.4.2 of
9 the Alaska WPG for authorization and permit requirements for secondary response strategies.

10 To request approval for wildlife hazing/deterrence, fill out a Startup or Comprehensive WRP (Section
11 [3650](#)) and submit to the wildlife agencies.

12 **4610.4.3 - Tertiary Response Strategies**

13 Tertiary response strategies for protecting wildlife include capturing, handling, stabilizing, transporting,
14 rehabilitating, holding, and releasing oiled or injured wildlife.

15 Only authorized and trained personnel may conduct these activities. See the Tertiary Response
16 Strategies (Section 3640.2.3) of the Alaska WPG for detailed information. Refer to Section 4610.4.3 of
17 the Alaska WPG for authorization and permit requirements for tertiary response strategies.

18 Although infrastructure for oiled wildlife stabilization and rehabilitation is limited on the Pribilofs, it may
19 be feasible to transport equipment and personnel to the community near the spill site. If on-site
20 rehabilitation is not possible, transport of stabilized animals to an appropriate facility on mainland
21 Alaska for treatment and rehabilitation could be an option. See [9740.2](#) for additional information about
22 species-specific tertiary response strategies.

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

25 **4800 - Required Correspondence, Permits & Consultation**

26 Implementation of wildlife response activities may require specific authorizations, permits, or
27 consultations. See the following sections of the Alaska WPG for more information:

- 28 • Authorizations and Permits for Carcass Collection (Section 3640.2.1.2)
- 29 • Authorizations and Permits for Wildlife Hazing/Deterrence (Section 3640.2.2.1.1)
- 30 • Authorizations and Permits for Secondary Response Strategies (Section 3640.2.2.3)
- 31 • Authorizations and Permits for Tertiary Response Activities (Section 3640.2.3.2)
- 32 • Emergency Endangered Species Act (ESA) Consultations (Section 4810)

1 4820 - Permits

2 Table 4-1. Summary of the fish and wildlife permits required for primary, secondary, and tertiary response activities (reproduced from the Alaska WPG, Section
3 4820.1).

Activity	Migratory birds	Sea otters, walruses, and polar bears	Whales, porpoises, dolphins, seals, and sea lions	Terrestrial mammals, furbearers, and non-migratory birds	Fish, shellfish, and invertebrates	Bald or golden eagles	Threatened or endangered species ¹
Carcass Collection	USFWS Migratory Bird Salvage Permit & OLE Authorization ²	USFWS Permit & OLE Authorization ²	NMFS MMHSRP Permit ³	ADF&G Wildlife Response Permit	ADF&G Wildlife Response Permit	USFWS Permit & OLE Authorization ²	NMFS/USFWS ESA section 7 consultation ⁴ & USFWS OLE Authroization ²
Haze/Deter	ADF&G Wildlife Response Permit	USFWS MMPA section 112(c) LOA	NMFS MMHSRP Permit ³	ADF&G Wildlife Response Permit	N/A	USFWS Eagle Depredation Permit	NMFS/USFWS ESA section 7 consultation ⁴
Capture, Transport, Stabilize, or Rehabilitate	USFWS Migratory Bird Rehab Permit	USFWS MMPA section 112(c) LOA	NMFS MMHSRP Permit ³	ADF&G Wildlife Response Permit	N/A	USFWS Eagle Depredation Permit	NMFS/USFWS ESA section 7 consultation ⁴

Acronyms: ADF&G = Alaska Department of Fish and Game; EPA = U.S. Environmental Protection Agency; NMFS = National Marine Fisheries Service; ESA = Endangered Species Act; LOA = Letter of Authorization; MMPA = Marine Mammal Protection Act; MMHSRP = Marine Mammal Health and Stranding Response Program (NMFS); USFWS = U.S. Fish and Wildlife Service; OLE = Office of Law Enforcement (USFWS); USCG = U.S. Coast Guard

Note: See Initial Emergency Contacts for a list of agency personnel to contact for appropriate authorizations and permits.

¹ 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.

² For species managed by USFWS (i.e., migratory birds, sea otters, walruses, and polar bears).

³ Request verbal case-by-case authorization from NMFS Regional Stranding Program Coordinator or associated co-investigator.

⁴ ESA section 7 consultation between federal action agencies (i.e., USCG or EPA) and consulting agencies (USFWS and NMFS).

4

1 **9000 - APPENDICES**

2 **9700 - Environmental, Fish & Wildlife Protection Plans**

3 The PI WPG and Alaska WPG are incorporated by reference into the AWA ACP in Appendix 9740. The
4 following sections are appendices of the PI WPG and include:

5 [9740.1 - Pribilof Islands Wildlife Protection Guidelines History & Revision Process](#)

6 [9740.2 - Species Information](#)

7 [9740.2.1 - Migratory Birds](#)

8 [9740.2.2 - Marine Mammals](#)

9 [9740.3 - Wildlife Response Tactics, Guidelines, and Forms](#)

10 [9740.3.1 - Wildlife Response Best Management Practices \(BMPs\)](#)

11 [9740.3.2 - Tactic: Wildlife Reconnaissance \(Recon\)](#)

12 [9740.3.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses](#)

13 [9740.3.4 - Wildlife Capture Forms](#)

14 [9740.3.5 - Checklist: Vessel Grounding or Sinking Response](#)

15 [9740.3.6 - Rat Prevention Guidelines for Vessels](#)

16 [9740.3.7 - Initiation and Close-Out Forms for ESA Section 7 Consultation](#)

17 [9740.3.8 - Wildlife Response Plans \(WRPs\)](#)

18 [9740.4 - Local Contact Signs](#)

19 [9740.5 - NMFS Marine Mammal Emergency Response Standards](#)

20 **9740.1 - Pribilof Islands Wildlife Protection Guidelines History & Revision Process**

21 In January 1997, the Pribilof Islands Wildlife Protection Subgroup was created by the Pribilof Islands
22 Working Group to develop wildlife protection guidelines specific to Saint Paul and St. George Islands
23 (hereafter referred to as the Pribilofs). The resulting PI WPG document was incorporated by reference in
24 the ARRT’s Alaska WPG. The Alaska WPG which was prepared by the ARRT Wildlife Protection
25 Committee (WPC). The Alaska WPG may be found online along with the PI WPG at the [ADEC Area Plan](#)
26 [References and Tools](#) website.

27 The PI WPG was first completed on August 1, 1998, following review and comments from the Pribilof
28 Islands Working Group and the ARRT WPC; the final version was submitted to the USCG, EPA, and ADEC
29 for inclusion in the former Aleutian Islands Subarea Contingency Plan for Oil and Hazardous Substance
30 Spills and Releases, now part of the Arctic & Western Alaska ACP. The PI WPG have been revised a
31 number of times since 1998 (see [Table 9-1](#)). This most recent revision incorporates a name change, as
32 well as a change in the revision notation (from revision 9 to version 2023.1) consistent with the Alaska
33 WPG nomenclature and revision notation.

34 Table 9-1. Version history and issue dates of the Pribilof Islands Wildlife Protection Guidelines.

PI WPG Version	Issue Date
Wildlife Protection Guidelines: Pribilof Islands	August 1998
Wildlife Protection Guidelines: Pribilof Islands, revision 1	May 2001

PI WPG Version	Issue Date
Wildlife Protection Guidelines: Pribilof Islands, revision 2	April 2002
Wildlife Protection Guidelines: Pribilof Islands, revision 3	August 2005
Wildlife Protection Guidelines: Pribilof Islands, revision 4	November 2006
Wildlife Protection Guidelines: Pribilof Islands, revision 5	April 2008
Wildlife Protection Guidelines: Pribilof Islands, revision 6	June 2009
Wildlife Protection Guidelines: Pribilof Islands, revision 7	June 2011
Wildlife Protection Guidelines: Pribilof Islands, revision 8	July 2014
Pribilof Islands Wildlife Protection Guidelines for Oil Spill Response, version 2023.1	February 2023

1 The PI WPG document is reviewed by the Pribilof Islands Working Group and updated as necessary.
2 Review and revision of the document is coordinated by the wildlife agencies. Proposed changes are
3 submitted to the Pribilof Islands Working Group for their review and concurrence. If the proposed
4 changes include substantive revisions, the revised PI WPG are also submitted to the WPC for review and
5 concurrence. Following incorporation of appropriate comments, the final revised PI WPG are submitted
6 to the USCG, EPA, and ADEC as a standalone document, for reference in the Arctic & Western Alaska
7 ACP, and subsequent distribution and placement on the ADEC webpage.

8 **9740.2 - Species Information**

9 **9740.2.1 - Migratory Birds**

10 Over 218 species of birds occur in the Pribilofs (seabirds, loons and grebes, shorebirds, songbirds, and
11 waterfowl). More than 2.7 million birds can be found on these islands in some of the largest colonies in
12 Alaska. These colonies may represent a large portion of a species' population. Some examples include:

- 13 • *Murres*: Approximately 1 million murres breed on St. George Island; a colony that represents the
14 largest concentration of murres in Alaska and the most numerous colonial species in the Pribilof
15 Islands.
- 16 • *Red-legged kittiwakes*: Approximately 85 percent of the world's population breed on the Pribilof
17 Islands.
- 18 • *Northern fulmars*: The Pribilofs are home to one third of the breeding concentrations of
19 northern fulmars in Alaska.
- 20 • *Parakeet auklets*: St. George Island has a major concentration of parakeet auklets in Alaska;
21 together Saint Paul and St. George Islands host over 20 percent of the recorded total of
22 parakeet auklets for the state.
- 23 • *Pribilof rock sandpipers*: Together, Saint Paul and St. George Islands are of major importance to
24 this subspecies of rock sandpiper.
- 25 • *Ruddy turnstones*: While most of these birds breed in north and west Alaska, they stage at Saint
26 Paul and St. George in the fall on their way to wintering grounds in the central Pacific.

27 The following section provides more information about the species present in the Pribilof Islands and
28 describes the ways in which response actions may be prioritized to minimize impact to migratory birds.

1 **9740.2.1.1 - Migratory Bird Protection Priorities**

2 Prioritized response strategies for different species or species groups may be established on an incident-
3 specific basis.

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

- 5 1. The species, or species group, is known to be particularly vulnerable to impacts from an oil spill.
6 In general, vulnerability to oil spills correlates with time spent in nearshore waters and coastal
7 habitats. For example:
 - 8 a. Seabirds (such as puffins, murres, auklets, petrels, shearwaters, kittiwakes, cormorants,
9 albatrosses, and gulls) are found on the oceans from coast to high seas; most are on
10 shore only during nesting season, but adults continue to feed at sea.
 - 11 b. Waterfowl (such as geese, swans, and ducks) and waterbirds (loons and grebes) are
12 often in nearshore waters; both groups use shores for nesting and waterfowl use shores
13 for resting.
 - 14 c. Shorebirds (such as sandpipers and turnstones) are generally found on shore (tidal
15 mudflats and rocks).
 - 16 d. Raptors (such as bald eagles and peregrine falcons) are generally not be considered
17 susceptible, except when feeding on marine birds or scavenging oiled carcasses.
- 18 2. The species in the planning area represents a significant proportion of the species' total world
19 population.
- 20 3. The species has been given a special status by state or federal agencies (e.g., ESA-listed).
- 21 4. The species is an important subsistence resource.
- 22 5. The species, or species group, is known to have an important breeding site in the planning area.

23 Specific habitats may be prioritized and the time of year in which a spill occurs may also be taken into
24 consideration. [Table 9-2](#) shows habitat types and species susceptibility to oiling depending on time of
25 year. Note that habitats such as marshes, estuaries, and lagoons are sensitive to long-term oil
26 contamination and should be prioritized for protection even when no birds are present.

27 Priority bird species in the Pribilofs are shown in [Table 9-3](#). Accidental species occur on the Pribilof
28 Islands. In general, these infrequent visitors are not included as priority bird species; however,
29 responders should be aware that uncommon species may be encountered during a spill response.

30 Table 9-2. Habitat types, seasonal use, and susceptibility to oiling of birds in the Pribilof Islands.

Habitat Type	Species	Activity	Season	Susceptibility to Oiling
Marshes, Estuaries & Lagoons	Waterfowl (primarily northern pintails, green-winged teal, and long-tailed ducks)	Nesting	Spring	High
Nearshore and Coastal	Shorebirds (rock sandpipers, ruddy turnstones)	Staging	Fall	High
Nearshore and Coastal	Auklets, particularly least and parakeet auklets, boulder beach habitats	Nesting/Feeding	Summer	High

Habitat Type	Species	Activity	Season	Susceptibility to Oiling
Nearshore and Coastal	Sea ducks (e.g., king eiders, long-tailed ducks, common eiders, harlequin ducks, and Steller's eiders)	Feeding	Winter to Spring	High
Nearshore and Coastal	Loons and grebes	Feeding	Spring to Fall	High
Nearshore and Coastal	Raptors	Feeding	Year round	High
Nearshore and Coastal	Cormorants	Nesting/Feeding	Spring to Fall	Medium
Nearshore and Coastal	Gulls	Feeding	Year round	Medium
Nearshore and Coastal	Kittiwakes (black-legged and red-legged)	Nesting/Feeding	Spring to Fall	High
Cliffs	Murres (thick-billed and common), auklets (least, parakeet, and crested), puffins (horned and tufted), and red-faced cormorants	Breeding	Summer	High
Offshore (Pelagic)	Pelagic seabirds (albatrosses, petrels, northern fulmars)	Feeding	Year round	Low
Offshore (Pelagic)	Shearwaters	Feeding	Summer	Low
Upland	Songbirds	Nesting/Feeding	Year round	Low
Upland	Raptors	Feeding	Year round	Low

- 1 Table 9-3. Avian Species of Concern in the Pribilof Islands. Criteria for inclusion are: The population of
- 2 the species in the planning area represents a significant proportion of the species' total world
- 3 population; the species, or species group, is known to be particularly vulnerable to impacts from an oil
- 4 spill; the species has been given a special status by state or federal agencies; the species is an important
- 5 subsistence resource; or the species, or species group, is known to have an important breeding site in
- 6 the planning area.

Species	Species Group	Occurrence	Status
American green-winged teal	WF	P	-
Bar-tailed godwit	SH	P	-
Black scoter	WF	R	Sb
Black-legged kittiwake	SE	P	Sb
Cackling goose	WF	R	Sb
Common eider	WF	P	Sb
Common murre	SE	P	Sb
Crested auklet	SE	P	-

Species	Species Group	Occurrence	Status
Glaucous-winged gull	SE	P	Sb
Greater white-fronted goose	WF	R	Sb
Greater yellowlegs	SH	R	-
Harlequin duck	WF	P	Sb
Horned puffin	SE	P	Sb
King eider	WF	U	Sb
Least auklet	SE	P	Sb
Least sandpiper	SH	P	-
Long-billed dowitcher	SH	R	-
Long-tailed duck	WF	P	Sb
Northern fulmar	SE	P	-
Northern pintail	WF	P	-
Pacific golden-plover	SH	P	-
Parakeet auklet	SE	P	-
Pomarine jaeger	SE	R	-
Pribilof rock sandpiper	SH	P	-
Red phalarope	SH	P	-
Red-faced cormorant	SE	P	Sb
Red-legged kittiwake	SE	P	Sb
Red-necked phalarope	SH	P	-
Red-necked stint	SH	R	-
Ruddy turnstone	SH	P	-
Semipalmated plover	SH	P	-
Semipalmated sandpiper	SH	U	-
Sharp-tailed sandpiper	SH	P	-
Short-eared owl	RA, UB	R	-
Short-tailed shearwater	SE	U	-
Snow goose	WF	R	-
Snowy owl	WF	R	-
Steller's eider	WF	P	Th
Thick-billed murre	SE	P	Sb
Tufted puffin	SE	P	Sb
Wandering tattler	SH	P	-

Species	Species Group	Occurrence	Status
Whimbrel	SH	U	-
White-winged scoter	WF	R	Sb
Species Group: RA = Raptor, SE = Seabird, SH= Shorebird, UB = Upland Bird, WF = Waterfowl, Occurrence: A = Accidental, P = Present, R = Rare, U = Uncommon, Status: Sb = Subsistence resource (throughout Alaska), Th = Threatened species (federal)			

1 **9740.2.1.2 - Migratory Bird Response Strategies**

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

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

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

- 15 • Degree of oiling and length of exposure.
- 16 • Health of the birds prior to exposure.
- 17 • Toxicity of the product spilled.
- 18 • Distribution of the spilled product in the environment.

19 **9740.2.1.2.1 - Primary Response**

20 Primary response strategies emphasize preventing oil from reaching birds or their concentration areas
21 through mechanical cleanup, on-water recovery (skimming), booming, *in situ* burning, or chemical use
22 (herders, dispersants, etc.). Mechanical cleanup and recovery are preferable to avoid air quality issues
23 with *in situ* burning, and exposure to additional chemicals including dispersants or dispersed oil.
24 (Additional information on effects of dispersants on birds can be found in the Coastal Response
25 Research Center (CRRC) publication *2018 State of the Science of Dispersants and Dispersed Oil (DDO) in*
26 *U.S. Arctic Waters: Ecotoxicity and Sublethal Impacts*, available on the [University of New Hampshire](#)
27 [Coastal Response Research Center](#) webpage.) *In situ* burns and dispersant use will be used under
28 procedures outlined in the *Alaska RCP*, Parts 3. A. (Chemical Dispersants) and 3.B. (*In Situ* Burning),
29 available on the ADEC [Regional Contingency Plan](#) webpage.

30 Oiled debris and oiled wildlife carcasses should be removed from the environment as soon as possible to
31 prevent secondary contamination of scavengers, including raptors. Secondary contamination can occur
32 through 1) ingestion of oily carcasses and, 2) physical contact with oil on carcasses or other oiled debris.
33 See Section [3640.2](#) and the *Tactic: Collection of Small Carcasses and Documentation of Large Carcasses*
34 (Section [9740.4.3](#)) for additional information on carcass collection.

35 **9740.2.1.2.2 - Secondary Response**

1 Secondary response strategies emphasize keeping birds away from oiled areas by deterrence, moving
2 birds from oiled areas using hazing, and pre-emptive capture, holding, and release of unoiled birds.
3 Sections [9740.3.1.2.1](#) and [9740.3.1.2.2](#) provide additional information about deterrence activities for
4 and pre-emptive capture of birds, respectively.

5 **9740.2.1.2.1 - Deterrence Activities**

6 Deterrent techniques can be used to discourage birds from landing in or near oil-contaminated areas. If
7 warranted, deterrence activities should be initiated as soon as possible following an oil spill to prevent
8 birds from establishing or continuing regular use patterns within a contaminated area. The choice of an
9 appropriate method will depend on incident-specific considerations, such as: the type of oil spilled, time
10 of year, species in the area, and availability of appropriate equipment, materials, and trained personnel.
11 A summary of deterrent methods, including a discussion of their effectiveness and their limitations can
12 be found in *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the [ADEC Area](#)
13 [Plan References and Tools](#) webpage.

14 Any deterrence activity should ensure there is nearby unoiled, safe habitat to which birds may move.
15 Because many deterrence techniques work by startling or frightening birds, they may acclimate, with
16 effectiveness declining over time. The effectiveness of deterrence tactics and potential unintended
17 effects on non-target species should be considered and assessed frequently.

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

27 Only individuals trained and certified in bird deterrence techniques by the U.S. Department of
28 Agriculture, Animal and Plant Health Inspection Service within the last three years will be authorized to
29 conduct migratory bird deterrence activities. Additional individuals may be approved by ADF&G on a
30 case-by case basis based on a thorough review of training protocols, training records, individual and
31 organization experience, and incident details. This information must be included in the Startup or
32 Comprehensive WRP (Section 9740.3.8 of the Alaska WPG) and approved by all wildlife agencies.
33 Oversight for migratory bird deterrence activities will be conducted by ADF&G and USFWS. [Table 9-3](#)
34 shows the list of trained people on the Pribilofs.

35 A list of migratory bird deterrence equipment and materials stockpiled in the Pribilofs is provided in
36 [Table 9-4](#).

37 Table 9-4. Pribilof Island residents with bird deterrent training

Individual	Location	Bird Deterrent Training Completion Date
Monty Baker	Saint Paul Island	May 2021
Dustin Jones	Saint Paul Island	May 2021
Shaun Lekanof	Saint Paul Island	May 2021
Aaron Lestenkof	Saint Paul Island	May 2021
Paul Melovidov	Saint Paul Island	May 2021

1 Table 9-5. Equipment and Materials stockpiled in the Pribilof Islands for Deterring Unoilied Birds

Location	Amount of Supplies	Number of Onshore Sites Addressed with Supplies	Owner	Contact Information
Saint Paul Island City of Saint Paul, Harbor Office	1 shotgun 14 each 12 gauge scare cartridges 42 screamers 43 bangers	1	City of Saint Paul	Victor Clarey, Harbormaster City of Saint Paul (Wk) 907-600-4366 (Cell) 907-631-8670 VHF Ch. 16
Saint Paul Island St. Paul Fuel, LLC	1 Mylar tape hazing kit (12 rolls)	1	Tanadgusix/ Delta Western	Dennis Bourdukofsky Delta Western (Wk) 907-546-4103/2312 (Hm) 907-546-2220 Shannon Christopher Nelson Saint Paul Island Operations Manager (Cell) 907-764-7440 shannon@tdxcorp.com
St. George Island Delta Western	1 shotgun/cracker shell hazing kit Mylar tape (12 rolls)	1	Delta Western	Ted Lekanof Delta Western (Wk) 907-859-2456 (Hm) 907-859-2208

2 **9740.2.1.2.2 - Bird Deterrence Forms and Tools**

- 3
- 4
- 5
- 6
- 7
- 8
- 9
- Request authorization to conduct bird deterrence in Startup or Comprehensive WRPs (Section [3650](#); Section [9740.4.8](#)).
 - Permits required for conducting bird deterrence activities are listed in [Table 4-1](#).
 - Deterrence activities for ESA-listed birds will be addressed via FOSC ESA consultation with USFWS (Section [4800](#)).
 - *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the [ADEC Area Plan References and Tools](#) webpage.

10 **9740.2.1.2.3 - Pre-emptive Capture**

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

18 Pre-emptive capture of birds requires personnel trained in bird capture, handling, transportation, and
 19 release techniques. The pre-emptive capture of birds on the Pribilofs is generally not feasible; however,
 20 decisions to conduct pre-emptive capture will be assessed on a case-by-case basis and will depend on

1 the availability of trained personnel, equipment, facilities, type of product spilled, and other incident-
2 specific variables. In cases where trained personnel and facilities are not available to pre-emptively
3 capture birds, observers will monitor the birds for signs of oiling.

4 **9740.2.1.2.3 - Tertiary Response**

5 Tertiary response strategies will be considered when birds become oiled. Tertiary response includes the
6 capturing, handling, transporting, rehabilitating, holding, and releasing of oiled birds. The USFWS policy
7 document *Best Practices for Migratory Bird Care during Oil Spill Response* (available on the [ADEC Area](#)
8 [Plan References and Tools](#) webpage) provides detailed information for tertiary response activities. When
9 oiled birds are captured alive, stabilized, and taken to rehabilitation centers, they can often be cleaned
10 and released back into their natural habitat. Initiating a capture, stabilization, and rehabilitation
11 program as soon as possible after a spill occurs may reduce the severity of impact to birds from oiling
12 and increase survival for oiled birds.

13 Tertiary response effectiveness will be influenced by time of year, type and amount of material spilled,
14 species involved, local terrain, tides, availability of trained personnel, and weather. A variety of capture
15 methods and techniques (e.g., including dip nets, net guns, mist nets, foot traps, and spotlighting) may
16 be used to maximize capture success. Captured birds will need to be stabilized and receive medical
17 evaluation and preliminary treatment as quickly as possible.

18 The rehabilitation of birds requires specialized equipment and facilities. At this time, there are no
19 facilities in the Pribilofs that could support the rehabilitation of birds. However, it may be feasible to
20 capture and stabilize oiled birds on-island and transfer them to an appropriate facility on mainland
21 Alaska. Stabilization facilities must provide:

- 22 • Shelter
- 23 • Ventilation
- 24 • Waste management

25 Wildlife response organizations in Alaska may also be able to ship by air modular units equipped for the
26 stabilization of birds.

27 The decision to stabilize birds on the Pribilofs will be made on a case-by-case basis and will depend on
28 the availability of trained personnel, equipment, facilities, type of product spilled, and other incident-
29 specific variables. In cases where trained personnel and facilities are not available to respond to oiled
30 birds, humane euthanasia under the supervision of a veterinarian should be followed to alleviate the
31 suffering of individual animals.

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

36 **9740.2.1.3.4 - Oiled Bird Capture, Stabilization, and Rehabilitation Forms and Tools**

- 37 • Request authorization to conduct oiled bird capture in Startup or Comprehensive WRPs (Section
38 [3650](#); Section [9740.4.8](#)).
- 39 • Permits required for conducting capture are listed in [Table 4-1](#).
- 40 • Any capture of ESA-listed birds will be addressed via a FOSC ESA consultation with USFWS
41 (Section [4800](#)).

- 1 • *Best Practices for Migratory Bird Care during Oil Spill Response*, available on the [ADEC Area Plan](#)
2 [References and Tools](#) webpage.
- 3 • Rehabilitated oiled birds of species that may be harvested for subsistence purposes will have an
4 OILED-TREATED leg band placed on them prior to release.

5 **9740.2.2 - Marine Mammals**

6 General Considerations

7 The Pribilofs provide breeding grounds and haulout sites for northern fur seals, Steller sea lions, and
8 harbor seals. In addition to the presence of these common pinnipeds on land, the surrounding waters
9 are home to sea otters and many cetacean species, some of which have been observed stranded on the
10 Pribilofs. In the sections below, we focus on nearshore and land-associated marine mammals when
11 addressing potential impacts of an oil spill and the associated responses, however, it is important to
12 document the presence of all marine mammals, both live and dead, in the area during an oil spill and
13 associated response.

14 **9740.2.2.1 - Marine Mammal Protection Priorities**

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

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

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

- 27 1. The species, or species group, is known to be particularly vulnerable to oil impacts.
- 28 2. The species in the planning area represents a significant proportion of the species' total
29 world population.
- 30 3. The species has been given a special status by state or federal agencies (e.g., ESA-listed).
- 31 4. The species is an important subsistence resource.
- 32 5. The species, or species group, is known to have an important breeding site in the
33 planning area.

1 Table 9-6. Occurrence and status of marine mammals near the Pribilof Islands: Criteria for inclusion are:
 2 The population of the species on or near the Pribilof Islands represents a significant proportion of the
 3 species' total world population; the species, or species group, is known to be particularly vulnerable to
 4 impacts from an oil spill; the species has been given a special status by state or federal agencies; or the
 5 species is an important subsistence resource; or the species, or species group, is known to have an
 6 important breeding site near the Pribilof Islands.

Species ¹	Occurrence ²	Status ³	Confirmed strandings (2010-2021)
Northern sea otter	R	S/ TS	1
Pacific walrus	R	S	11
Northern fur seal	P	S/ DS	62
Steller sea lion	P	S/ ES	24
Bearded seal	R	S/ TS	-
Harbor seal	P	S	3
Spotted seal	P	S	-
Ribbon seal	O	-	-
Ringed seal	R	S/ TS	7
Northern elephant seal	P/O	-	1
Minke whale	P	-	1
Fin whale	P	ES	3
Gray whale	P	ES	2
Sei whale	P	ES	-
North Pacific right whale	P	ES/ SES	-
Blue whale	P	ES/ SES	-
Baird's beaked whale	P	-	1
Cuvier's beaked whale	P	-	-
Stejneger's beaked whale	P	-	-
Beluga whale	P	S	3
Killer whale	P	P	3
Sperm whale	P	ES	1
Harbor porpoise	P	P	3
Dall's porpoise	P	-	-

¹USFWS manages sea otters and walruses; other marine mammals in this table are managed by NMFS.
² P = Present; U = Uncommon; R = Rare; O = Pelagic/Offshore
³ S = Subsistence Species; TS = Threatened Species; ES = Endangered Species; SES = State Endangered Species;
 DS=depleted under MMPA

7 **9740.2.2.2 - Marine Mammal Response Strategies**

8 NMFS Alaska Region has developed or contributed to regional, statewide, and national guidance
 9 documents specific to marine mammals under our jurisdiction. NMFS Alaska Region Protected
 10 Resources Division has also developed general guidelines and standards for response capacity by
 11 responsible parties. These documents can all be found at this [Alaska Oil Spill Response webpage](#).

12 **9740.2.2.2.1 - NMFS Alaska Region Marine Mammal Stranding Network**

13 All disaster response activities involving NMFS trust species must first be authorized under the
 14 MMPA/ESA permit issued to the NMFS Marine Mammal Health and Stranding Response Program

1 (MMHSRP). MMHSRP has *Pinniped and Cetacean Oil Spill Response Guidelines* to direct and inform
2 response activities for pinnipeds and cetaceans – guidelines that align with response actions being taken
3 for other wildlife species at risk. The Alaska Regional Stranding Coordinator serves as a co-investigator
4 on this permit, and as such, can authorize marine mammal disaster response activities in collaboration
5 with NMFS MMHSRP. NMFS expects that trained members of the stranding network, and/or their
6 designees, would be granted authorization to carry out many of the marine mammal-related roles in the
7 Wildlife Branch under the Unified Command.

8 NOTE: Stranding Agreement (SA) holders alone do not authorize decision-making, handling, sampling,
9 transport, or treatment of oil-affected NMFS species. These activities, as well as all stranding responses
10 involving ESA-listed marine mammals, fall under the MMHSRP Permit and require NMFS authorization.
11 Further, oil spill responses involving all NMFS species and some enhancement activities during stranding
12 responses (e.g., collection of biological samples and euthanasia) are also authorized under the MMHSRP
13 permit.

14 The NMFS Alaska Region Marine Mammal Stranding Network (AK Stranding Network) was created to
15 provide a consistent framework in which to collect and compile data about marine mammal strandings
16 throughout the entire state. The network is composed of state and federal wildlife and fisheries
17 agencies, local governments, veterinary clinics, wildlife response facilities, Alaska Native Organizations,
18 academic institutions, and individuals who respond to or provide professional advice on handling
19 strandings.

20 The Aleut Community of St. Paul is the only organization holding a SA on the Pribilofs. Members of the
21 AK Stranding Network should serve in leadership positions in the ICS organization, with additional
22 response capacity brought in as needed. The SA holder in each region will serve as the primary local lead
23 during an oil spill response along with NMFS staff; additional stranding network members, locally
24 trained community members, and contractors can be brought in to assist as needed.

25 Additional details available in:

- 26 • Ziccardi, M.H., S.M. Wilkin, T.K. Rowles, and S. Johnson. 2015. *Pinniped and Cetacean Oil Spill*
27 *Response Guidelines*. U.S. Dept. of Commerce, NOAA. NOAA Technical Memorandum NMFS-
28 OPR-52, 138 p. Available from the [NOAA Institutional Repository](#).
- 29 • 2022 Final Programmatic Environmental Impact Statement for the Marine Mammal Health and
30 Stranding Response Program: Cetacean and Pinniped Transport Best Practices (Appendix X),
31 Marine Mammal Euthanasia Best Practices (Appendix XIII), and Marine Mammal Carcass
32 Disposal Best Practices (Appendix XIV).

33 **9740.2.2.3 - Marine Mammal Information by Species**

34 **9740.2.2.3.1 - Sea Otters**

35 Sea otters were extirpated from the Pribilof Islands during the commercial fur trade which extended
36 from the mid-1700s to late 1800s. Sea otters were reintroduced to the Pribilof Islands in the mid-1900s,
37 which resulted in a small population (fewer than 10) at Dalnoi Point to Garden Cove of St. George
38 through the 1990s. The current distribution of sea otters in the Pribilofs is not well understood,
39 however, individual sea otters may be observed in the waters around St. George Island and dead
40 stranded otters have been reported from both Saint Paul and St. George islands.

41 Sea otters are extremely vulnerable to oil spills, regardless of age, because of their small size,
42 dependence on fur rather than blubber for insulation, and heavy use of near-shore habitats. The sea
43 otters in the Pribilofs are part of the southwest Alaska distinct population segment (DPS) of northern sea

1 otters; this DPS was listed as threatened under the ESA in 2005 (70 FR 46365; August 9, 2005). All sea
2 otters in Alaska are also protected under the MMPA.

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

12 **9740.2.2.1.5 - Response Strategies for Sea Otters**

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

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

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

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

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

29 Primary response strategies may also include sea otter carcass collection.

30 Secondary Response Activities. The use of deterrence (e.g., auditory, visual, olfactory, and/or herding) to
31 either attract or disperse sea otters has been found to be ineffective because sea otters habituate
32 readily to noise and other distractions associated with human activity. Although slight behavioral
33 modifications have been observed in response to deterrence activities, the modification and duration of
34 the effect were inadequate for protecting sea otters from potential impacts of an oil spill. Of the
35 possible deterrent techniques, auditory deterrence such as propane cannons may have some
36 application for short-term attempts to keep sea otters off oiled haulouts. In general, sea otter hazing
37 from oiled areas will not be authorized unless the hazing will be conducted by someone familiar with sea
38 otter behavior that can judge the effectiveness of the hazing/deterrence technique in real time.

39 Pre-emptive capture may be a viable strategy for moving sea otters away from areas contaminated by
40 oil, especially if small numbers of sea otters have a high potential for being oiled. Principal concerns
41 when capturing and handling sea otters are minimizing transportation and holding times and clear
42 communication between capture teams and receiving facility staff. Sea otters in captivity should be
43 regarded as dangerous to response personnel; therefore, sea otters should be handled as little as

1 possible during response operations. Handling should be conducted by qualified personnel with
2 documented experience in sea otter capture.

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

- 4 • Having the equipment necessary to handle and transport animals as quickly and efficiently as
5 possible.
- 6 • Reducing the number of vessels used to capture animals.
- 7 • Avoiding unnecessary noise and disturbance.
- 8 • Never pursuing a sea otter to the point of exhaustion.
- 9 • Providing thermoregulatory monitoring and ambient temperatures.
- 10 • Minimizing contact with animals.
- 11 • Providing veterinary care.

12 Tertiary Response Strategies. Capturing, handling, transporting, stabilizing, rehabilitating, and releasing
13 oiled animals must be performed only by people with documented experience in capturing and handling
14 oiled sea otters. This response strategy was first initiated in Prince William Sound and the Gulf of Alaska
15 following the March 24, 1989, T/V *Exxon Valdez* spill and other spills along the Pacific coast.

16 Rehabilitation of sea otters requires specialized equipment and facilities. At this time, there are no
17 facilities in the Pribilofs that could support the rehabilitation of sea otters; however, it may be feasible
18 to capture and stabilize oiled otters on-island and transfer them to an appropriate facility. These
19 decisions will be made on a case-by-case basis and will depend on availability of trained personnel,
20 equipment, facilities, type of product spilled, and other incident-specific variables. In cases where
21 trained personnel and facilities are not available to respond to oiled otters, humane euthanasia under
22 the supervision of a veterinarian should be considered to alleviate the suffering of individual animals.

23 Procedures and protocols for the care of oiled otters may be found in *Emergency Care and*
24 *Rehabilitation of Oiled Sea Otters*, available on the [ADEC Area Plan References and Tools](#) webpage.

25 **9740.2.2.1.6 -Sea Otter Response Forms and Tools**

26 Sea Otter Primary Response Strategies Forms and Tools:

- 27 • Request authorization to conduct sea otter carcass collection in Startup or Comprehensive WRPs
28 (Section [9740.4.8](#)).
- 29 • Permits required for conducting primary response activities that may affect otters are shown in
30 [Table 4-1](#).

31 Sea Otter Secondary Response Strategies Forms and Tools:

- 32 • Request authorization to conduct sea otter deterrence and pre-emptive capture and holding in
33 Comprehensive WRPs (Section [9740.4.8.2](#)).
- 34 • Permits required for conducting sea otter deterrence or pre-emptive capture and holding are
35 listed in [Table 4-1](#).
- 36 • Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on
37 the [ADEC Area Plan References and Tools](#) webpage.

38 Sea Otter Tertiary Response Strategies Forms and Tools:

- 1 • Request authorization to conduct oiled sea otter capture, transport, stabilization, rehabilitation,
2 release, or relocation in Startup or Comprehensive WRPs (Section [9740.4.8](#)).
- 3 • Permits required for conducting oiled sea otter capture and related activities are listed in [Table](#)
4 [4-1](#).
- 5 • Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on
6 the [ADEC Area Plan References and Tools](#) webpage.

7 If primary, secondary, or tertiary response strategies are proposed in locations where northern sea
8 otters are or may be present, the FOSC should immediately consult with USFWS regarding the proposed
9 response strategies to ensure compliance with the MMPA and ESA (Section [4800](#)). Information on
10 wildlife agency permits required for conducting response activities affecting sea otters is in [Table 4-1](#).

11 **9740.2.2.3.2 - Pinnipeds**

12 Northern fur seals, Steller sea lions, and harbor seals are all common pinniped species on the Pribilofs.
13 Detailed information about these three species and their vulnerability to oil spills is provided below.

14 **9740.2.2.2.7 -Northern Fur Seals**

15 The Pribilofs provide breeding grounds for approximately 50 percent of the world’s population of
16 northern fur seals (Iaquadan). Hundreds of thousands of these animals return to the Pribilofs each
17 summer to give birth, breed, rest, and molt before departing on their winter migration in December. The
18 world population of the northern fur seals is currently (2022) estimated at 1.1 million. The Pribilof
19 Islands portion of the US population of northern fur seals declined by over 60 percent from over 2
20 million in the 1970s to an estimated 547,000 in 2012. The species is currently listed as depleted under
21 the MMPA. The Pribilof fur seal population has declined about 3-5 percent annually from 2010 to 2022.

22 Northern fur seals are highly migratory and range along a broad arc across the north Pacific from the Sea
23 of Japan through the southern Bering Sea to the Channel Islands (i.e., San Miguel Island) off southern
24 California. Fur seals spend the winter and spring at sea in the Pacific Ocean and southern Bering Sea and
25 return to their Bering Sea and North Pacific islands for pupping, breeding, resting, and molting. Each
26 year, these animals use several discrete shoreline locations on the Pribilofs for mating and pupping
27 (rookeries) and non-breeding landing sites (haulouts).

28 The rookeries on Saint Paul Island are found from Zapadni Point to Tolstoi Point (i.e., four specific
29 locations surrounding English Bay), along the shoreline of the peninsula south of the City of Saint Paul
30 (i.e., three specific locations on the Reef Point Peninsula) and an offshore rock east of the Reef Point
31 Peninsula (i.e., Sea Lion Rock rookery), from the north side of Black Bluffs to north of Lukanin Point (i.e.,
32 Kitovi and Lukanin Rookeries), along the eastern shoreline from Polovina Point north for approximately
33 3 km (i.e., Polovina Rookeries), and around the entire perimeter of the northernmost tip of the island
34 (i.e., Northeast Point Rookeries). St. George Island also has several northern fur seal rookeries found
35 along the north coast from First Bluffs to the City of St. George (i.e., Staraya Artil and North Rookeries),
36 beginning about 2 km east of the city extending to Tolstoi Point (i.e., East Rookeries), and along the
37 southwest coast from the harbor directly south for 1.5 km (i.e., Zapadni and South Rookeries). Non-
38 breeding northern fur seals also haul out at Otter and Walrus Islands. See Environmentally Sensitive
39 Areas maps for specific rookery locations on Saint Paul, St. George, and Bogoslof islands.

40 From June through November there is constant movement of northern fur seals resting on land and
41 entering the Bering Sea to forage. At any time, about 25-30 percent of the non-pup portion of the
42 population is on land, while the remainder are at sea for 1-3 weeks before returning to land on the
43 Pribilofs. Pups are found along the rookery shorelines and do not enter the water until mid-August and

1 progressively spend more time in the water until weaning in November. The boat harbors on both
2 islands and the Salt Lagoon on Saint Paul Island may contain up to 1,000 northern fur seal pups and 50
3 male juvenile northern fur seals from September through November.

4 Adult male northern fur seals arrive at breeding sites on the Pribilofs in mid-May. Adult males
5 aggressively defend their territories from mid-May through August and are likely to charge anyone
6 entering the rookery. Adult females arrive in mid-June and are present on the rookeries until December.
7 Adult female northern fur seals are aggressive and are also likely to charge if cornered. Juvenile northern
8 fur seals arrive on land in mid-May, in groups of 100 or less, and by July and August are found in groups
9 up to 1,000. By November, fur seals begin their winter migrations and numbers on land decline
10 precipitously during December, and most are gone by January. Juvenile northern fur seals and pups
11 normally avoid humans on land and in some cases will stampede towards the water; however, they are
12 also likely to charge if cornered or approached closely.

13 Northern fur seals are an important subsistence food source to the Unangan communities on Saint Paul
14 and St. George Islands. Pribilof Island residents can harvest up to 2,500 non-breeding male northern fur
15 seals annually.

16 Potential Oil Spill Impacts

17 Northern fur seals rely on the water-repellent quality of their fur rather than a thick layer of blubber to
18 provide insulation from the cold temperatures of the Bering Sea and North Pacific Ocean. For this
19 reason, fur seals are particularly vulnerable to oil exposure. Oiling of their fur diminishes the insulating
20 capacity and can result in death from hypothermia. Other impacts of direct exposure to hydrocarbons in
21 pinnipeds include injury to the skin, eyes, and mucous membranes. In addition to effects of external
22 oiling, inhalation of petroleum product vapors may result in increased levels of toxic hydrocarbon
23 volatiles in blood and tissues of northern fur seals. The toxic effect of inhalation may be lethal,
24 particularly during the first few hours of a spill when volatile fractions are released, or for significant
25 spills of refined products (i.e., gasoline or diesel fuel), which contain higher percentages of these
26 compounds. Possible effects include lethargy, sickness, destruction of the central nervous system and
27 respiratory system. Exposure to high concentrations of volatiles may result in fur seal mortality.
28 Ingestion of oil via grooming of oiled pelage, or indirectly through consumption of oiled prey, may also
29 have deleterious effects via absorption into the blood across stomach and intestinal lining. Ingestion of
30 oil can cause nausea, gastrointestinal tract irritation, and vomiting. Vomiting can result in aspirating oil
31 into the lungs, leading to respiratory impacts.

32 Northern fur seals concentrate on the breeding grounds of the Pribilofs from June to December. Sub-
33 adult animals, adult females, and non-breeding males all frequently return to the sea to feed (8 to 12
34 day foraging trips) during this period, which would increase exposure to floating oil released by a spill.
35 By early September, all sex and age classes, including pups, regularly enter the water and would be
36 potentially vulnerable to a spill. Fur seal pups often congregate in tidal pools and shallow nearshore
37 waters where oil can become trapped or concentrated, potentially putting pups at greater risk of oiling
38 than adults.

39 From 1995 to 2021, 120 oil spills were reported on or near the Pribilofs (41 of which were vessel-based
40 spills) according to the Alaska Department of Environmental Conservation database (ADEC Spills
41 Database). The 120 spills include petroleum and non-petroleum (synthetic) oil spills. The largest spill in
42 the Pribilofs during this time period occurred in 2017 when a fishing vessel sank near St. George Island.
43 The capsized vessel released 35,456 gallons of diesel into the marine environment, none of which was
44 recovered (ADEC Spills Database). During the same time period (1995-2021), 1,079 spills were reported
45 in the eastern Aleutian Islands, 499 of which were vessel-based (ADEC Spills Database). Due to the

1 subjective nature of the reporting of the location of spills and the nearby rookeries on Bogoslof Island,
2 spills in the eastern Aleutians are important to consider for possible impacts to northern fur seals. The
3 three largest of the eastern Aleutian Island spills from 1995 to 2021 were 39,000 gallons in November
4 1997, 321,052 gallons in December 2004, and 145,000 gallons in March 2008. If these spills had
5 occurred during spring or fall during fur seal migration, they could have significantly impacted fur seals
6 migrating through Aleutian Islands passes. In the event that an oil spill approaches or contacts a rookery,
7 cleanup efforts may be directed to both nearshore and offshore regions. Disturbance to northern fur
8 seals may result from the presence of oil spill response workers and associated aircraft, vessel, and
9 ground support vehicles. Northern fur seals may respond to human presence by immediate departure
10 from the area. Prolonged or intense disturbance could result in abandonment of the site. Disturbance
11 during the breeding season could result in increased mortality of fur seal pups due to disrupted nursing
12 or crushing due to stampedes of frightened animals.

13 **9740.2.2.2.8 -Steller sea lions**

14 The Steller sea lion (qawan) is the largest member of the family Otariidae, which includes sea lions and
15 fur seals. Steller sea lion distribution extends along the Pacific Rim with the center of abundance in the
16 Aleutian Islands and Gulf of Alaska where, historically, nearly three-quarters of all Steller sea lions in the
17 United States were found. Steller sea lions haul-out on land to mate, bear their young, nurse, rest, and
18 avoid predators and disturbance. Steller sea lions are generally considered non-migratory although
19 some individuals, particularly juveniles and adult males, disperse widely outside the summer breeding
20 season. Pupping occurs at discrete sites (rookeries) from mid-May through mid-July. Sites classified as
21 haulouts may be used throughout the year. Molting periods normally extend from June through
22 September, during which time Steller sea lions may remain out of water for extended periods.

23 Under the ESA, the species is delineated into two DPSs; the western DPS (primarily west of 144°W
24 longitude) is listed as endangered (62 FR 24345, May 5, 1997). Steller sea lions on the Pribilofs and
25 Bogoslof Island are part of the endangered western DPS. The western DPS has shown dramatic declines
26 in the last several decades. At many sites, the number of Steller sea lions has declined by more than 80
27 percent since the mid- to late 1970s, and at some sites in the western Aleutians, sea lions have all but
28 disappeared. There are several major Steller sea lion haulouts on Saint Paul and St. George Islands as
29 well as rookeries on Walrus and Bogoslof Islands. Saint Paul and St. George Islands are within designated
30 Steller sea lion critical habitat, and Bogoslof Island is part of the Bogoslof Special Aquatic Foraging
31 critical habitat area.

32 Steller sea lions are an important subsistence food source to the Unangan communities on Saint Paul
33 and St. George Islands. Approximately 10 to 30 Steller sea lions are harvested annually on Saint Paul
34 Island with a 30-50 percent struck and lost rate. Steller sea lions have not been harvested on St. George
35 Island for a few years prior to 2022, but 1 to 3 may be harvested annually.

36 Potential Oil Spill Impacts

37 Spills (depending on many variables such as amount and type of product spilled) can affect the health,
38 survival, and reproduction of exposed Steller sea lions. Steller sea lions can also be impacted by
39 response activities, such as helicopter and vessel activity. Steller sea lions are highly susceptible to
40 disturbance when on haulouts and rookeries. The marked sexual dimorphism in size within the species
41 and the large size of adults, especially adult males, are both features of Steller sea lion morphology that
42 are important to consider when evaluating their vulnerability to disturbance when the animals are
43 hauled out on land. Smaller animals are vulnerable to injury and death if trampled by adults, especially
44 by large males. The large size of Steller sea lion adults also makes the capture, handling, and salvage of

1 this species more challenging than many other pinnipeds. Capture of subadult and adult Steller sea lions
2 is typically conducted by an experienced team using remote sedation.

3 Inhalation of volatile components of crude oil can damage mucous membranes including the airways,
4 which can lead to lung congestion and can cause hemorrhagic bronchopneumonia and pulmonary
5 edema. Ingestion of crude oil can lead to diarrhea, increased passage time of food through the intestinal
6 tract, and decreased nutritional value of food. Skin irritation and conjunctivitis could result from
7 prolonged exposure to oil. Such conditions can increase an individual's physiological stress and increase
8 the likelihood of death of individuals that are highly contaminated or already weakened.

9 Steller sea lions are more easily disturbed when on haulouts and rookeries than northern fur seals.
10 However, Steller sea lions are less susceptible to adverse effects of external oiling than are northern fur
11 seals. Unlike northern fur seals, adult Steller sea lions have a thick layer of fat, and do not rely on their
12 fur for insulation. Oil could be ingested through mouth grooming, from oiled food, or by pups during
13 nursing. Within the Steller sea lion population, females and pups have the greatest risk of oiling. During
14 the pupping and breeding season, females spend part of their time on the rookery and part of their time
15 feeding at sea. Steller sea lion pups, which are generally weaned one to two years after birth, have less
16 subcutaneous fat than adults and are likely to be more sensitive to the effects of oiling. In addition, pups
17 can ingest oil from their mothers while nursing.

18 **9740.2.2.2.9 - Harbor seals**

19 Harbor seals (*isugi*) inhabit coastal and estuarine waters from Baja California, Mexico, north along the
20 western coasts of the United States, British Columbia, and Southeast Alaska, west through the Gulf of
21 Alaska and Aleutian Islands, and into the Bering Sea north to Cape Newenham and the Pribilofs. They
22 haul out on rocks, reefs, beaches, and drifting glacial ice, and feed in marine, estuarine, and occasionally
23 fresh waters. Harbor seals generally are non-migratory, and local movements are associated with such
24 factors as tides, weather, season, food availability, and reproduction. Strong fidelity of individuals for
25 haulout sites during the breeding season has been documented in some regions in Alaska. In 2010,
26 NMFS and their co-management partners, the Alaska Native Harbor Seal Commission, identified 12
27 separate stocks of harbor seals based largely on genetic differences as well as population trends,
28 observed harbor seal movements, and traditional Alaska Native use areas. One stock occurs on the
29 Pribilof Islands, including on Saint Paul and St. George Islands, as well as on Otter and Walrus Islands.

30 Counts of harbor seals in the Pribilofs ranged from 250 to 1,224 in the 1970s. Counts in the 1980s and
31 1990s ranged between 119 and 232 harbor seals. Prior to July 2010, the most recent count was 202
32 seals in 1995. In July 2010, approximately 185 adults and 27 pups were observed on Otter Island for a
33 maximum count of 212 harbor seals. Counts from 2010 (all ages) are close to the 1995 counts (212 vs.
34 202), but 2010 pup numbers were slightly less (27 vs. 42). July 2015 was the first year that counts were
35 conducted on both Otter Island and St. George Island, resulting in a total count of 235 seals (all ages).
36 The Pribilof Island harbor seal stock was last surveyed in 2018 with 229 seals counted on Saint Paul, St.
37 George, and Otter Islands in early September. Counts of the Pribilof Island stock have typically been
38 opportunistic and have not supported the development of a correction factor to estimate the
39 proportion of seals in the water during surveys. If the mean of the estimated standardized correction
40 factors of the two nearest stocks (Aleutian Islands and Bristol Bay) are applied to the 2018 Pribilof Island
41 stock counts, then approximately 515 harbor seals are in the Pribilof Island region. The current
42 population trend on the Pribilofs is unknown.

43 Harbor seals are an important subsistence food source to the Unangan communities on Saint Paul and
44 St. George Islands.

45 **9740.2.2.2.10 -Response Strategies for Pinnipeds**

1 **9740.2.2.2.11 -Primary Response Strategies**

2 Primary response measures are the most effective and realistic means of protecting and maintaining the
3 Pribilof's northern fur seals and other pinniped species. NMFS is currently researching various
4 countermeasures to prevent spills from contacting pinnipeds (including northern fur seals) and their
5 habitat and to remove hydrocarbons from contaminated beaches. Sorbent materials such as pads and
6 sausage booms are effective when used on refined product spills, such as diesel and gasoline. These
7 devices would be the first line of defense for spills in the Saint Paul and St. George boat harbors and in
8 the Salt Lagoon on Saint Paul Island. Heavier oils, such as crude or Bunker C, may be contained with
9 booms and collected with oleophilic materials such as pom poms and natural sorbent materials. A peat
10 moss-based material, Sphag sorb, was successfully used on a February 1997 oiled South American fur
11 seal rookery in Uruguay and has now been stockpiled on Saint Paul Island, as shown in [Table 9-7](#).

12 High volume, low pressure flushing with ambient temperature water may be the most effective means
13 of oil removal from many Pribilof Island shorelines. High temperature, high pressure washing is
14 discouraged, as it may change the substrate on a rookery beach and may also alter the ability of a fur
15 seal to locate a rookery using its sense of smell.

16 The use of chemical shoreline cleaning agents has been shown to be only marginally effective and
17 introduces additional chemicals and odors onto the rookeries and haulouts. Therefore, NMFS does not
18 support the use of chemical shoreline cleaning agents on coastal areas used by fur seals or other
19 pinnipeds.

20 As outlined in Section 4610.2.2 of the Alaska WPG, field activities associated with oil spills have the
21 potential for causing unnecessary and illegal disturbance to pinnipeds and their habitats. To reduce
22 disturbance and improve the chances for their survival, NMFS will reiterate, through the FAA and FOSC,
23 the importance of abiding by existing notices to aircraft currently in place for the Pribilofs. Those
24 advisories request pilots to remain at a certain distance from northern fur seal and Steller sea lion
25 concentration areas and sensitive habitats, such as rookeries.

26 Information on aircraft advisories for St. George and Saint Paul islands may be found on the FAA [Flight
27 Advisories for Wildlife Sensitive Areas](#) webpage.

28 NMFS will also provide, through the FOSC, notices to mariners for areas affected by an oil spill. These
29 advisories may request vessel operations to remain at a certain distance from pinniped concentration
30 areas and sensitive habitats.

31 Copies of advisories will be sent by the FOSC to all federal and state agency and agency-contracted spill
32 response personnel. In addition, a news release will be prepared by NMFS on this subject for distribution
33 by the FOSC to appropriate news media representatives.

34 Furthermore, oiled debris—particularly contaminated food sources and oiled pinniped carcasses—
35 should be removed from the environment as soon as possible to prevent scavenging by other wildlife,
36 which may result in secondary effects due to the ingestion of oil. See Section [4610.4.1](#) for information
37 on the retrieval and disposition of oiled wildlife carcasses and Marine Mammal Carcass Disposal Best
38 Practices (Appendix XIV) of the *Final Programmatic Environmental Impact Statement for the Marine
39 Mammal Health and Stranding Response Program* (2022).

1 Table 9-7. Materials stockpiled on the Pribilof Islands for pinniped protection

Location	Amount of Supplies	Owner	Contact Information
<p>Saint Paul Island</p> <p>In 20-foot connexes on the concrete pad south of the GARCO Warehouse</p>	<p>1,400 30-pound bags of Sphag sorb</p>	<p>National Marine Fisheries Service</p>	<p>Mike Williams NMFS (Wk) 907-271-5117 (Hm) 907-748-0706 OR Sadie Wright NMFS 907-586-7630, 907-957-8147 OR Tom Gelatt Marine Mammal Laboratory (Wk) 206-526-4040</p>
<p>Saint Paul Island</p> <p>Inside the GARCO Warehouse above the south side entry door</p>	<p>9 yellow plastic 95-gallon overpack salvage drums each containing 1 to 3 25-foot sections of lightweight oil recovery boom</p>	<p>National Marine Fisheries Service</p>	<p>Mike Williams NMFS (Wk) 907-271-5117 (Hm) 907-748-0706 OR Sadie Wright NMFS 907-586-7630, 907-957-8147 OR Tom Gelatt Marine Mammal Laboratory (Wk) 206-526-4040</p>

2 **9740.2.2.2.12 -Secondary Response Strategies**

3 NMFS may use or authorize the use of incident-specific deterrents to prevent pinnipeds from entering
 4 oiled areas. NMFS personnel (or individuals designated by NMFS) would be authorized to initiate and
 5 direct any deterrence activities in order to avoid unintended consequences (e.g., driving animals into
 6 oiled areas, causing stampedes or large flight reactions into the water, or increasing metabolic stress).

7 It may be feasible to deter pinnipeds from a particular area in some situations. Spills within the Saint
 8 Paul Island Harbor and Village Cove area could put several hundred northern fur seals at risk, many of
 9 which are likely to be pups or juveniles. Northern fur seals and other pinnipeds may be herded by small
 10 boats into the outer portions of Village Cove or into the Salt Lagoon. It may also be possible to move
 11 animals away from or toward a section of a beach or rookery to prevent oiling or to enable cleanup of
 12 oiled shorelines. However, depending on the time of year, this would not be feasible for territorial
 13 animals and would risk separating mother-pup pairs. Because pups in the harbor are not suckling,
 14 mother-pup reunions would not be disrupted during deterrent efforts.

15 A NMFS proposed rule (85 FR 53763) to deter marine mammals provides a list of guidelines to safely
 16 deter marine mammals and specific measures which may be used to nonlethally deter marine mammals
 17 listed under the ESA. These guidelines are intended to deter marine mammals from damaging fishing
 18 gear and catch, damaging personal or public property, or endangering personal safety, and may provide
 19 useful information during an oil spill response. In addition, NMFS and ECO have personnel who are

1 familiar with deterring or moving northern fur seals because it is a tactic they use during research and
2 disentanglement activities.

3 **9740.2.2.2.13 -Tertiary Response Strategies**

4 Capturing and cleaning oiled adult pinnipeds may not be feasible due to concerns for both the safety of
5 the animals and the human responder. See *Cetacean and Pinniped Transport Best Practices* in the
6 Appendices of the *Final Programmatic Environmental Impact Statement for the Marine Mammal Health
7 and Stranding Response Program (2022)*. Unless the probability of survival for an oiled animal is
8 considered very low, and the likelihood of successful rehabilitation is very high, tertiary response
9 strategies will not be used. Capture and rehabilitation of adult pinnipeds could require administering
10 sedatives or other drugs in the field. Pups and juveniles can be small enough to capture and rehabilitate.
11 However, many logistical requirements for the treatment of pinnipeds, such as a large, heated building,
12 holding pens for large animals, and high-capacity hot water systems, cannot be met at this time on the
13 Pribilofs. Euthanasia under the supervision of a veterinarian or as authorized by NOAA Regional
14 Stranding Coordinator or others authorized under the MMHSRP permit should be followed to alleviate
15 suffering for individual animals with no chance of survival. Also, see *Marine Mammal Euthanasia Best
16 Practices* in Appendix XIII of the *Final Programmatic Environmental Impact Statement for the Marine
17 Mammal Health and Stranding Response Program (2022)*.

18 **9740.2.2.2.14 -Pinniped Response Forms and Tools**

- 19 • Request authorization to conduct pinniped response activities (hazing/deterrence, preemptive
20 capture and related activities, or oiled animal capture and related activities) in Startup or
21 Comprehensive WRPs (Section [9740.4.8](#)).
- 22 • Permits required for conducting pinniped deterrence or pre-emptive capture are listed in [Table
23 4-1](#).

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

27 **9740.2.2.3.3 - Cetaceans**

28 There are numerous cetacean species found in the waters surrounding the Pribilof Islands including
29 killer whales, Dall's porpoise, harbor porpoise, sperm whale, humpback whale, fin whale, minke whale,
30 and North Pacific right whale. Some of these species have also stranded on the shores of the Pribilof
31 Islands ([Table 9-6](#)).

32 Primary and Secondary response measures are generally the only feasible response strategies for this
33 group of marine mammals. Primary response strategies may include carcass collection for smaller
34 cetaceans or photo documentation and sampling of larger carcasses.

35 Secondary Response Activities. The use of deterrents (e.g., auditory, visual, olfactory, and/or herding) to
36 either attract or disperse cetaceans will need to be evaluated on a case-by-case basis. Some species,
37 particularly large whales (such as humpback whales), could possibly be steered away from a spill site.
38 Other species, such as Dall's porpoise and killer whales, are attracted to ship traffic and human activity
39 and might be attracted to a spill. If primary response strategies are proposed in locations where
40 cetaceans are (or may be) present, the FOSC should immediately consult with NMFS regarding the
41 proposed strategies to ensure compliance with the MMPA and ESA.

- 1 • Request authorization to conduct cetacean response activities (hazing/deterrence, pre-emptive
2 capture and related activities, or oiled animal capture and related activities) in Startup or
3 Comprehensive WRPs (Section 9740.3.8 of the Alaska WPG).
- 4 • Permits required for conducting cetacean response activities are listed in Table 4-1.
- 5 • Deterrence techniques have been developed for killer whales in Washington State and may be
6 appropriate for killer whales or other cetacean species in Alaska:
- 7 ○ Supporting Information for the Killer Whale section of the Northwest Wildlife Response
8 Plan, Chapter 9970 of the Northwest Area Contingency Plan, available from the NOAA Office
9 of Response and Restoration [Oil Spill Response and Killer Whales](#) webpage.
- 10 ▪ Norris, Kenneth S., and Roger L. Gentry. 1974. Capture and Harnessing of Young
11 California Gray Whales, *Eschrichtius robustus*. Marine Fisheries Review 36(4):58-64.
- 12 ▪ Mate, Bruce R. and James T. Harvey, eds. 1987. Acoustical Deterrence in Marine
13 Mammal Conflicts with Fisheries. Proceedings of a February 17 18, 1986, Workshop
14 in Newport, Oregon. Oregon State University Sea Grant College Program, Corvallis,
15 Oregon.
- 16 ▪ Appendices for the 1) *NMFS Arctic Marine Mammal Disaster Response Guidelines*
17 and 2) *NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines*,
18 available from the [NOAA Institutional Repository](#).

19 If primary, secondary, or tertiary response strategies are proposed where cetaceans are present or may
20 be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to
21 ensure compliance with the MMPA and ESA.

1 **9740.3 - Wildlife Response Tactics, Guidelines, and Forms**

2 The following sections contain the tactics, guidelines, and forms referenced in the WPG:

3 [9740.4.1 - Wildlife Response Best Management Practices \(BMPs\)](#)

4 [9740.4.2 - Tactic: Wildlife Reconnaissance \(Recon\)](#)

5 [9740.4.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses](#)

6 [9740.4.4 - Wildlife Capture Forms](#)

7 [9740.4.5 - Checklist: Vessel Grounding or Sinking Response](#)

8 [9740.4.6 - Rat Prevention Guidelines for Vessels](#)

9 [9740.4.7 - Initiation and Close-Out Forms for ESA Section 7 Consultation](#)

10 [9740.4.8 - Wildlife Response Plans \(WRPs\)](#)

11 The annual update process will include additional or updated tactics, guidelines, and forms. Full-page
12 printable and fillable versions of applicable forms are available on the [ADEC Area Plan References and](#)
13 [Tools](#) webpage.

1 **9740.3.1 - Wildlife Response Best Management Practices (BMPs)⁷**

2 These BMPs were developed as measures to reduce impacts to wildlife and their habitats during an oil
3 spill response and for responder safety. These should be considered general guidance during spill
4 responses. Not all BMPs will be applicable to every response, which is why incident-specific guidance is
5 developed through the ESA section 7 consultation process and the Startup and Comprehensive WRPs.
6 Best available information and professional judgment should be used when determining how to
7 implement these BMPs during each response. BMPs include:

8 For All Response Activities

- 9 1. Watch for and avoid collisions with wildlife; report all distressed or dead birds, marine
10 mammals, fish, and other wildlife to Wildlife Branch or supervisor.
- 11 2. Ensure work areas are well-lit to minimize inadvertent impacts to wildlife or their habitat.
- 12 3. Responders should follow procedures described in Section [3640.2](#) to report all oiled and unoiled
13 carcasses to enable an assessment to determine if the animal may have died from spill-related
14 causes (e.g., inhalation of product fumes or in situ burning, vessel/vehicle strike, or
15 entanglement from gear in the water). These mortalities should be documented and, when
16 possible, carcasses collected or photo documented according to procedures outlined in Section
17 3640.2.1.1.
- 18 4. Work with Operations and Planning Sections to mitigate impacts to subsistence activities from
19 response activities.
- 20 5. Avoid transporting or introducing invasive species (e.g., rats).

21 For Land-Based Activities

- 22 6. Avoid disturbing vegetation and shorelines with foot traffic, boats, and equipment. Consult
23 wildlife agency representatives in the Wildlife Branch or Environmental Unit if disturbance
24 cannot be avoided.
- 25 7. Use existing access and egress areas and roadways.
- 26 8. Use low-pressure tire vehicles (e.g., all-terrain vehicles or side-by-side) or consult with wildlife
27 agency representatives in the Wildlife Branch or Environmental Unit to minimize impact.
- 28 9. Minimize removal of clean (unoiled) sediments.
- 29 10. Staging areas and waste collection areas should be examined, and land management agencies
30 (e.g., Alaska Department of Natural Resources) consulted, for the presence of historical
31 properties, cultural resources, and biological resources prior to establishment. Support
32 infrastructure should be located away from sensitive habitats, including shorelines, scrub,
33 riparian habitat, and other vegetated areas.
- 34 11. All heavy equipment use should be as low on the beach as possible and avoid the high tide or
35 wrack line while conducting cleanup activities. Keep heavy equipment away from the wrack line
36 unless the wrack line is oiled.
- 37 12. Activities that require removal of riparian, forested, scrub, shrub, or other vegetated habitat
38 should be minimized.

⁷ A standalone version of these BMPs can be found on the [ADEC Area Plan References and Tools](#) webpage.

1 13. Waste management should be conducted in a manner that minimizes attracting wildlife (e.g.,
2 removing trash daily from work sites). If possible, cut all materials that form closed loops (e.g.,
3 plastic packing bands, rubber bands, and all other loops) prior to proper disposal in a closed and
4 secured trash bin.

5 14. Stakes or flagging that preceded the spill and response activities should not be removed or
6 destroyed.

7 For Aircraft Activities

8 15. Adhere to incident-specific flight restrictions over sensitive habitats and avoid hovering or
9 landing aircrafts in these areas.

10 16. Adhere to flight altitude restrictions over wildlife management areas and other managed lands.

11 For On-water Activities

12 17. If marine mammals or birds become trapped or entangled in boom, anchor lines, or other
13 response equipment, notify wildlife agency representatives for instructions.

14 18. Install and monitor underwater equipment or booms to prevent entrapment of fish and wildlife.

15 19. Do not block major egress points in channels, rivers, passes, and bays.

16 20. Use a properly screened water intake to avoid impacts to fish, especially juvenile or small
17 resident fish. The intake should be centered with a screened enclosure to reduce the potential
18 for fish to be entrained, impinged, or injured. Contact ADF&G for recommendations on screen
19 mesh sizes and minimum water velocity depending on the location and timing of water
20 withdrawal activities.

21 Additional information on wildlife response considerations, protection measures, and activities relevant
22 to the Operations Section can be found in Section [3600](#).

23 **9740.3.2 - Tactic: Wildlife Reconnaissance (Recon)**

24 A grab-and-go version of this tactic begins on the following page. A standalone version of the tactic and
25 a full-page version of the associated form are available on the [ADEC Area Plan References and Tools](#)
26 webpage. Please check this website for the most recent version.

1 Tactic: Wildlife Reconnaissance (Recon)

2 Objective and Strategy

- 3 • Identify and locate any wildlife that may be present and affected by a spill or response activities.
- 4 • Incidental wildlife (marine or terrestrial mammal, bird, fish, and invertebrate) observations can
- 5 be made by any spill responder. Systematic wildlife observations are the primary responsibility
- 6 of Wildlife Observers.

7 Tactic Description

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

29 Safety Considerations

- 30 • Bear guards should be used when working on land or in near-shore environments when bears
- 31 may be present, or as outlined in the incident- specific Safety Plan.
- 32 • Observers should exercise situational awareness depending on their observation platform. For
- 33 example, slips, trips, and falls are a particular hazard on land and Personal Floatation Devices
- 34 should be worn on vessels.
- 35 • Traveling on steep or unstable surfaces (cliffs, mud, exposed slopes, shoreline rocks with surf,
- 36 etc.) should be avoided.

- 1 • Personal protective equipment (PPE; e.g., nitrile gloves, oil-resistant outerwear such as Tyvek
2 coveralls) will be outlined in the incident-specific Safety Plan and is dependent on the potential
3 exposure to oil in the observing environment.

4 Operational Considerations

5 Operating Environments, Geographic Considerations, and Access

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

14 Species Type and Life Stage

- 15 • Incidental wildlife observations can be made by any responder, from any platform.
- 16 • Wildlife Observers may use species-specific or platform-specific protocols, such as marine
17 mammal shipboard surveys or waterfowl aerial surveys.
- 18 • Be aware of species-specific requirements for non-approach zones (setback distances), sensitive
19 time periods, and other factors to prevent or minimize disturbance.

20 Communications

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

36 Equipment, Vehicles or Vessels, and Personnel for Wildlife Recon Tactic (See [Table 9-8](#) on next page).

1 Table 9-8. Equipment, Vehicles or Vessels, and Personnel for Wildlife Recon Tactic.

Equipment		Quantity	Function/Notes
Binoculars		1	Observe and identify wildlife.
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., personal flotation device for boat-based surveys)
Vessel/Vehicles			
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		
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 Unified 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.

2

1 Implementation

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

- 4 1. **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales, 5
5 seals)
- 6 2. **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out,
7 floating/sitting in the water, transiting in a northerly direction)
- 8 3. **Where are they?** (preferably latitude/longitude, but could also be a description, e.g.,
9 “nearshore/shoreline approximately 1 kilometer from oil, in [*name of*] Bay”)
- 10 4. **Other relevant details** (e.g., degree of oiling, condition of animal [alive, fresh dead, advanced
11 decomposition, skeletal]).
- 12 5. **Photos and video** are very helpful.

13 Wildlife Observers

14 1. Preparation:

- 15 a. Determine appropriate observation platform and ensure that Wildlife Observers have all
16 required platform-specific training and PPE (e.g., Personal Floatation Device for boat-
17 based recon).
- 18 b. Obtain and review standard survey methods for specific platform or any incident-
19 specific survey protocols. Obtain permits and authorizations (if needed) for specific
20 method/protocol. Obtain landowner permission if required.
- 21 c. Obtain equipment, Wildlife Observation Forms (print on Rite-in-the-Rain[®] or other
22 water resistant paper).
- 23 d. Obtain map/charts/aerial photos of area to be surveyed.
- 24 e. Coordinate with Mapping Specialist as needed to determine incident-specific format of
25 any electronic data such as track-lines, waypoints, data file transfers, geo-referenced
26 photos, etc.

27 Coordinate timing of surveys through Operations to ensure platforms and resources are available and to
28 prevent interference with other response activities

29 2. Field Implementation:

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

34 3. Deliverables (end-of-shift):

- 35 a. Completed Wildlife Observation Form(s) for each area surveyed.
- 36 b. Map of areas travelled and surveyed.
- 37 c. Any other documentation required by incident-specific protocols and formats.

1 d. SD cards, cameras, and GPS units turned in or data downloaded.

2 Notes:

3 Related Tactics

4 • Carcass Collection

5 References

6 None in this version.

7 Forms (on following pages)

8 • Figure 9-2: Wildlife Observation Form

9 ○ A printable version of this form is available on the on the [ADEC Area Plan References](#)
10 [and Tools](#) webpage.

11 Print landscape orientation on both sides of one sheet of water- resistant paper.

1 Figure 9-1. Wildlife Observation Form (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

Page _____ of _____

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	# of Animals	Details
EXAMPLE 0805	57.70816 N	-52.32819 W	seabirds	certain	18	mixed seabird flock incl 10 least auklets; feeding, not traveling, 2 km from oil, no visible oiling. WP 33
						START SURVEY (write time, location)

2 *Wildlife Observation Form – WPG Version 2020.1 (front page)*

Figure 9-1 continued

Lead Observer Name: _____	Date: _____	Page _____ of _____
END SURVEY (write time, location)		
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 for 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.	# of Animals: Record the number of individuals of the same species or species group. Large numbers can be a range; for example, "40-50 mew gulls."	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.
<i>Wildlife Observation Form – WPG Version 2020.1 (back page)</i>		

1

- 1 **9740.3.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses**
- 2 A grab-and-go version of this tactic begins on the following page. A standalone version of the tactic and
- 3 full-page versions of the associated forms and job aid are available on the [ADEC Area Plan References](#)
- 4 [and Tools](#) webpage. Check this website for the most recent version.

1 Tactic: Collection of Small Carcasses and Documentation of Large Carcasses

2 Objective and Strategy

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

7 Tactic Description

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

18 Safety Considerations

- 19 • Bear guards, or appropriate bear safety equipment, should be used where bears may be
- 20 present, or as outlined in the incident-specific Safety Plan.
- 21 • Slips, trips, and falls are a particular hazard for carcass collection because people may be
- 22 focused on searching for carcasses while walking in rough, slippery terrain.
- 23 • Avoid steep and unstable surfaces (cliffs, mud, exposed slopes, shoreline rocks with surf, etc.).
- 24 • Primary PPE for carcass collection are nitrile gloves. Other PPE (e.g., oil-resistant outer- wear
- 25 such as Tyvek coveralls) will be outlined in the incident-specific Safety Plan, and is dependent on
- 26 the level of carcass oiling, amount of oil in the environment, and weather.

27 Operational Considerations

28 Operating Environments, Geographic Considerations, and Access

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

1 Species Type and Life Stage

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

22 Communications

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

34 Equipment, Vehicles or Vessels, and Personnel for Carcass Collection Tactic

- 35 • See [Table 9-9](#) on next page.

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

Equipment	Quantity	Function/Notes
Personal Protective Equipment (PPE)	As needed	Ensure safety of responders
Bear pepper spray	As needed	As outlined in incident-specific Safety Plan
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 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

Equipment		Quantity	Function/Notes
Non-coated (e.g., kraft) roll of paper		1	If carcasses larger than will fit in a large paper bag are anticipated.
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			
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	
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.

1 Notes:

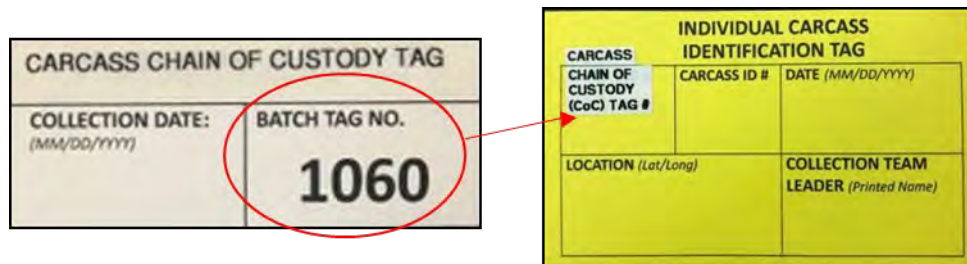
1 Implementation

2 1. Preparation:

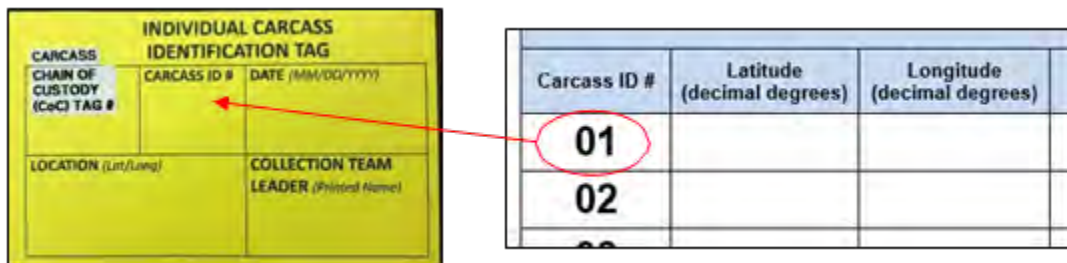
- 3 a. Obtain PPE, equipment, and printed copy of Permits and Authorizations.
- 4 b. Ensure activities can be safely conducted.
- 5 c. Determine if Bear Guards or bear safety equipment are needed for shoreline or inland
- 6 activities in accordance with the incident-specific Safety Plan.

7 2. Field Implementation (see also Figure 9-3: Carcass Collection Job Aid For Small Carcasses)

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



- 21
- 22 ii. The Carcass ID # on Individual Carcass Identification Tag is the pre-printed
- 23 number from the next blank line on the Carcass Collection Form.



- 24
- 25 iii. Individual Carcass Identification Tags may be a color other than yellow. If pre-
- 26 printed Individual Carcass Identification Tags are not available, use waterproof

1 paper to create a tag and write the date, time, location (Lat/Long), and
 2 Collector's Name on it.

- 3 d. COLLECTOR: Tie completed Individual Carcass Identification Tags to the outside of each
- 4 plastic carcass bag.
- 5 e. RECORDER: On the Individual Carcass Log section of the Carcass Collection Form,
- 6 complete the line corresponding to the selected Carcass ID No. (Lat/Long, Species,
- 7 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							

- 8
- 9 f. COLLECTOR: Place bagged and tagged carcasses inside of larger plastic "batch" bag.
- 10 i. A "batch" is the number of animals that fit inside a large plastic bag and will vary
- 11 from 1 to 10 carcasses depending on species size and number of carcasses.
- 12 g. RECORDER AND COLLECTOR: Repeat Steps b-f until the batch is complete.
- 13 i. Start a new "batch" when: 1) Ten carcasses have been collected (and Carcass
- 14 Collection Form is complete); 2) Batch bag is full; or 3) Moving to a new area.
- 15 h. RECORDER: Place completed Carcass Collection Form in a re-sealable, waterproof (e.g.,
- 16 Ziploc) bag. Place this bag inside the batch bag but outside of any individual carcass
- 17 bags.
- 18 i. RECORDER: Complete and sign a Carcass Chain of Custody (CoC) Tag for each batch of
- 19 carcasses.
- 20 j. COLLECTOR: Tie completed, signed Carcass Chain of Custody (CoC) Tag to outside of
- 21 batch bag.
- 22 k. RECORDER: For carcasses too large to collect, take photographs and write in field
- 23 notebook:
- 24 i. Personnel name(s), time, date, and location (Lat/Long and description);
- 25 ii. Species or species group and numbers of each species observed;
- 26 iii. Estimated degree of oiling and location of carcass relative to known oiled area;
- 27 iv. Number and location of photographs.

28 3. Transport and Storage

- 29 a. RECORDER AND TRANSPORTER: Sign Carcass Chain of Custody (CoC) Tag when carcasses
- 30 are transferred.
- 31 b. TRANSPORTER: Complete Transport Log for Carcasses following instructions on back of
- 32 form.
- 33 c. TRANSPORTER: Keep carcasses as cool as possible.

- 1 d. TRANSPORTER: Deliver carcasses to additional TRANSPORTER if needed (i.e., from vessel
- 2 to vehicle) or to agency-designated Evidence Custodian at morgue or designated
- 3 transfer point.
- 4 i. The Carcass Chain of Custody (CoC) Tag is signed by both TRANSPORTERS each
- 5 time the carcasses change possession.
- 6 ii. The Evidence Custodian will sign the Carcass Chain of Custody (CoC) Tag, and
- 7 inspect and catalogue all collected carcasses, then ensure storage until plans are
- 8 made for final disposal.
- 9 4. Deliverables
- 10 a. Correctly bagged carcasses and batches of carcasses.
- 11 b. Completed Individual Carcass Identification Tag for each carcass.
- 12 c. Completed Carcass Chain of Custody (CoC) Tag for each “batch” of 1-10 carcasses.
- 13 d. Completed Carcass Collection Form for each “batch” of 1-10 carcasses.
- 14 e. Completed Transport Log for Carcasses for each shift and mode of transportation.
- 15 f. Copies of field notebooks and photographs for each shift.
- 16 g. SD cards, cameras, and GPS units turned in or data downloaded.

17 Notes:

- 1 Figure 9-2. Carcass Collection Job Aid for Small Carcasses (full-page version available on the [ADEC Area Plan References and Tools](#) webpage).
- 2

Carcass Collection Job Aid

Search Crew Start Here

Carcass Collection Form
Use one form for each batch of carcasses.

Fill out the top section of the Carcass Collection Form.

Only fill out the shoreline search section on back of form if instructed to do so by incident-specific protocols.

SHORELINE SEARCH INFORMATION
Date: _____ Location and Shoreline Segment: _____

Wear nitrile gloves when handling carcasses.

Note: A new pair of gloves should be donned at the start of each new search location.

1

When a carcass is located, place the carcass into a paper bag **OR** wrap large birds or mammals with paper. **Note:** Do NOT place used gloves in bag with carcass. Do NOT put carcasses directly in plastic bags.

2

Place the paper-bagged carcass into a clear plastic bag and tie securely.

3

Tag the plastic bag with an Individual Carcass Identification Tag or a waterproof tag with Date, Time, Location, and Collector's Name.

4

Fill in the carcass information in the INDIVIDUAL CARCASS LOG section of the Carcass Collection Form.

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

Repeat steps 1-4 for all carcasses found in search area. Once all carcasses are collected follow the steps below.

Complete the bottom section of the Carcass Collection Form.

Fill out the Carcass Chain of Custody Tag then record the pre-printed Batch Tag No. on the Carcass Collection Form.

CARCASS CHAIN OF CUSTODY TAG
COLLECTION DATE: _____ BATCH TAG NO. **1060**

Place all clear bagged carcasses found in the location in a large plastic bag.

Fold the Carcass Collection Form in half, place it in a Ziplock™ bag, and then place it in the large bag.

Sign the Carcass Chain of Custody Tag and attach to the plastic bag.

The bag of carcasses is handed to the transporter.

Transporter signs Carcass Chain of Custody Tag and records information in the Transport Log for CARCASSES.

At the end of each day, the carcass collector or transporter should transfer all collected carcasses to the pre-designated carcass custodian (likely from a wildlife resource agency).

Carcass Collection Job Aid
WPG Version 2020.1

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

From: Name (Full)	Received Signature
To: Name (Full)	Received Signature

Transport Log for CARCASSES
Form stays with Transport Team

TRANSPORTATION	
Transportation Mode or Call Sign	W.S. Position Group, Task Force, etc.

Job Role Key:

Recorder

Collector

3

1 Additional Resources for Large Carcasses

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

5 Related Tactics

- 6 • Wildlife Reconnaissance (Recon)

7 References

- 8 • National Marine Fisheries Service. 2017. NMFS Arctic Marine Mammal Disaster Response
9 Guidelines. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/AKR-16. 81 p. doi:
10 10.7289/V5/TM-F/AKR-16. Available from the [NOAA Institutional Repository](#).
- 11 • National Marine Fisheries Service. 2019. Cook Inlet & Kodiak Marine Mammal Disaster Response
12 Guidelines. NOAA Fisheries Guidance Document. pp 80 + appendices. Available from the [NOAA
13 Institutional Repository](#).
- 14 • Ziccardi, M.H., S.M. Wilkin, T.K. Rowles, and S. Johnson. 2015. Pinniped and Cetacean Oil Spill
15 Response Guidelines. U.S. Dept. of Commerce, NOAA. NOAA Technical Memorandum NMFS -
16 OPR - 52, 138 p. Available from the [NOAA Institutional Repository](#).

17 Forms (on following pages)

- 18 • Figure 9-3: Carcass Collection Form
 - 19 ○ A printable version of this form is available on the on the [ADEC Area Plan References
20 and Tools](#) webpage.
 - 21 ○ Print landscape orientation on both sides of one sheet of water-resistant paper.
- 22 • Figure 9-4: Individual Carcass Identification Tag
 - 23 ○ Pre-printed, as pictured, or use a water-resistant blank tag, two sides.
- 24 • Figure 9-5: Carcass Chain of Custody (CoC) Tag
 - 25 ○ Pre-printed or use a water-resistant blank tag, two sides.
- 26 • Figure 9-6: Carcass Intermediate Transporters Log
 - 27 ○ A printable version of this form is available on the on the [ADEC Area Plan References
28 and Tools](#) webpage.
 - 29 ○ Print landscape orientation on both sides of one sheet of water-resistant paper

1 Figure 9-3. Carcass Collection Form (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

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 assigned):			
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.							
Carcass Collection Form – WPG Version 2020.1 (front page)							

2

Figure 9-3 continued

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 for designated Carcass Collector, who serves as Collection Team Leader.
Data Recorder: Record information for 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). PERSONAL PHONE OR CAMERA USE IS NOT RECOMMENDED.		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) Batch Tag 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 – WPG Version 2020.1 (back page)		

1

1 Figure 9-4. Individual Carcass Identification Tag (pre-printed or water-resistant two-sided blank tag); 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.

2

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

CARCASS CHAIN OF CUSTODY TAG

COLLECTION DATE: <i>(MM/DD/YYYY)</i>	BATCH TAG NO. 1060
COLLECTION TEAM NAME:	
LOCATION DESCRIPTION:	
LIST OF EACH CARCASS IN THIS BATCH BY INDIVIDUAL CARCASS ID #:	
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
From (Name/Co.)	Release Signature	Date
To (Name/Co.)	Receipt Signature	Date

2

- 1 Figure 9-6. Carcass Intermediate Transporters Log (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

Page _____ of _____

Transport Log for CARCASSES Form stays with Transport Team		Incident Name:			
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) <u>FROM</u> <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) <u>TO</u> <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>

Transport Log for CARCASSES – WPG Version 2020.1 (front page)

2

Figure 9-6 continued

Incident Name: _____ Data Recorder Name: _____ Page _____ of _____

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, 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, 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.	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.
Transport Type: Check appropriate box.		
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) FROM: 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) TO: 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		

1

1 **9740.3.4 - Wildlife Capture Forms**

2 This section contains live animal capture and transport forms. Full-page versions of the forms are
3 available on the [ADEC Area Plan References and Tools](#) webpage. Check this website for the most recent
4 versions of the following forms:

- 5 • Figure 9-8: Live Animal Capture Form
 - 6 ○ Print landscape orientation on both sides of one sheet of water-resistant paper.
- 7 • Figure 9-9: Capture Log for live Animals
 - 8 ○ Print landscape orientation on both sides of one sheet of water-resistant paper.
- 9 • Figure 9-10: Transport Log for live Animals
 - 10 ○ Print landscape orientation on both sides of one sheet of water-resistant paper. These
 - 11 forms are provided for personnel who have been trained in live animal capture and
 - 12 transport.

13 Training is provided by some OSRO/PRACs and can also be provided by resource agencies upon request.

1 Figure 9-7. Live Animal Capture Form (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

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: _____	INV (OLE Use Only): _____
				Animal Number: _____ Rehab Facility Use Only	
CAPTURE TEAM INFORMATION					
Transportation Name or Call Sign: _____ <small>Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/></small>		ICS Position <small>Group, Task Force, Strike Team:</small> _____		Data Recorder Name & Employer <small>(Phone & Email, if there is no ICS position):</small> _____	
Lead Animal Handler Name & Employer <small>(Phone & Email, if there is no ICS position):</small> _____				Assistant Animal Handler Name & Employer: _____	
CAPTURE INFORMATION					
Date: MM/DD/YYYY		Time: _____ AM PM		Location Name: _____	
		Longitude: _____		Latitude: _____	
				GPS Datum: WGS84 <input type="checkbox"/> NAD83 <input type="checkbox"/> NAD27 <input type="checkbox"/>	
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"/> EUTHANIZED <input type="checkbox"/> RELEASED <input type="checkbox"/> <small>if released or euthanized explain in notes below</small>
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"/> ; EUTHANIZED <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"/> MORGUE <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"/> ; EUTHANIZED <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"/> MORGUE <input type="checkbox"/>		Transferor's Printed Name: _____		Signature: _____	
Receiver's Printed Name: _____		Signature: _____		Affiliation: _____	

LIVE Animal Capture Form – WPG Version 2020.1 (front page).

2

Figure 9-7 continued

Incident Name: _____		Animal Reference Number: _____	
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"/> ; EUTHANIZED <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"/> MORGUE <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"/> ; EUTHANIZED <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"/> MORGUE <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"/> ; EUTHANIZED <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"/> MORGUE <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. <i>If injured, describe the injury</i>).	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 – WPG Version 2020.1 (back page)

1 Figure 9-8. Capture Log for Live Animals (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

Page _____ of _____

Capture Log for LIVE Animals Form stays with Capture Team				Incident Name:		
CAPTURE 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>						
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>(MMDD/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>(MMDD/YYYY)</i>

2 Capture Log for LIVE Animals – WPG Version 2020.1 (front page)

Figure 9-8 continued

Incident Name: _____ Data Recorder Name: _____ Page _____ of _____

Animal Reference Number <i>Located on LIVE Animal Capture Form</i>	Species or Species Group (bird, sea otter, seal, etc.)	CAPTURE DATE/TIME (MM/DD/YYYY)	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 (MM/DD/YYYY)

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, AND must also be signed by each transporter.

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 (<i>information should be the same as on LIVE Animal Capture Form</i>).		
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.		
THIS FORM STAYS WITH THE CAPTURE TEAM		

1 Figure 9-9. Transport Log for Live Animals (two pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

Page _____ of _____

Transport Log for LIVE Animals <i>Form stays with Transport Team</i>		Incident Name: _____			
TRANSPORT TEAM INFORMATION					
Transportation Name or Call Sign: _____ <small>Type: BOAT <input type="checkbox"/> AIRCRAFT <input type="checkbox"/> VEHICLE <input type="checkbox"/></small>		ICS Position Group, Task Force, Strike Team: _____		Data Recorder Name & Employer (Phone & Email, if there is no ICS position): _____	
LOG INFORMATION					
Animal Reference Number <small>Located on LIVE Animal Capture Form</small>	Species or Species Group (bird, sea otter, seal, etc.)	Transporter Received the Live Animal FROM : <small>Name of the signatory (Captor or Transferor) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position</small>	DATE/TIME <small>(MM/DD/YYYY)</small>	Transporter Gave the Live Animal TO : <small>Name of the signatory (Receiver) on the LIVE Animal Capture Form, Transportation Name or Call Sign, Affiliation or ICS Position</small>	DATE/TIME <small>(MM/DD/YYYY)</small>

2 *Transport Log for LIVE Animals – WPG Version 2020.1 (front page)*

Figure 9-9 continued

Incident Name: _____ Data Recorder Name: _____ Page _____ of _____

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.	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

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.
---	--

THIS FORM STAYS WITH THE TRANSPORT TEAM

Transport Log for LIVE Animals – WPG Version 2020.1 (back page)

1 **9740.3.5 - Checklist: Vessel Grounding or Sinking Response⁸**

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

3 Does the stricken vessel have rats on board, or has it ever tied up at a port that has rats? (See [Figure 9-](#)
4 [11](#) and [Table 9-8](#).)

5 NO

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

8 NO

9 YES → Notify Unified Command

10 → Notify Liaison Officer

11 → Notify USFWS Oil Spill Response Coordinator (907-242-6893,
12 fwsakspillresponse@fws.gov)

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

14 **2a. Are there nets, lines (including anchor lines), or other gear in the water?**

15 NO

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

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

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

19 Pots: Long-line pots or standard?

20 → Is the deployed gear attached to the vessel?

21 NO

22 YES

23 **2b. Is there non-deployed gear (out of the water) that could become an entanglement issue if the**
24 **vessel capsizes or sinks?**

25 NO

26 YES → Describe as completely as possible:
27 _____

28 **3. DISPOSAL OF ON-BOARD CATCH (see Section [3630.2.1](#)):**

29 **3a. Does oiled fish or seafood need to be disposed of?**

30 NO

⁸ A standalone version of this checklist can be found on the [ADEC Area Plan References and Tools](#) webpage.

1 YES → Notify Unified Command; oil-contaminated catch may not be disposed of in the
2 water; it must be disposed of in permitted landfills, at disposal facilities outside of Alaska,
3 or other locations approved by ADEC.

4 3b. Does unhoiled catch need to be disposed of in water because it is spoiled or because it is causing
5 vessel instability?

6 NO

7 YES → Notify Unified Command.

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

10 → If disposal is proposed in ocean waters, as defined under the Marine Protection,
11 Research, and Sanctuaries Act (MPRSA), 33 USC 1402(b)⁹, contact EPA Alaska
12 Operations Office, (907) 271- 5083. Permitting exclusions may apply, depending
13 on disposal location.

14 → If disposal is proposed in state waters shoreward of the baseline,¹⁰ verbal or
15 written authorization is required from the ADEC Environmental Health Division. If
16 disposal is proposed in state waters seaward of the baseline¹¹, verbal or written
17 authorization is required from the ADEC Environmental Health Division and EPA.
18 Contact ADEC at (907) 269-7681.

19 **4. INVASIVE SPECIES OTHER THAN RATS (see Section 3630.4):**

20 4a. Is there a potential for other invasive species to be on board (e.g., in ballast water, on hulls, in
21 cargo)?

22 NO

23 YES → Consult with NMFS, USFWS, and ADF&G on possible exposure pathways and
24 species (see the ADF&G Invasive Species webpage).

25 **5. OTHER IMPACTS (see Section 3630.5):**

26 5a. Will the vessel be removed, salvaged, or scuttled?

27 NO

28 YES → Notify Unified Command.

29 → Contact EPA if scuttling is proposed in MPRSA-defined ocean waters (see the EPA
30 Disposal of Vessels at Sea webpage).

⁹ “Ocean waters” means those waters of the open seas lying seaward of the “baseline” from which the territorial sea is measured, as provided for in the Convention on the Territorial Sea and the Contiguous Zone (15 UST 1606; TIAS 5639).

¹⁰ Generally, the baseline is the mean lower low water line (ordinary low water mark) along the coast, or “closing lines” that are depicted on maps across river mouths and openings of bays. An ArcGIS Online Map Viewer with maritime boundaries, including closing lines and state and federal waters, is maintained by NOAA on the [NOAA Baseline \(Server\) – Alaska](#) web site.

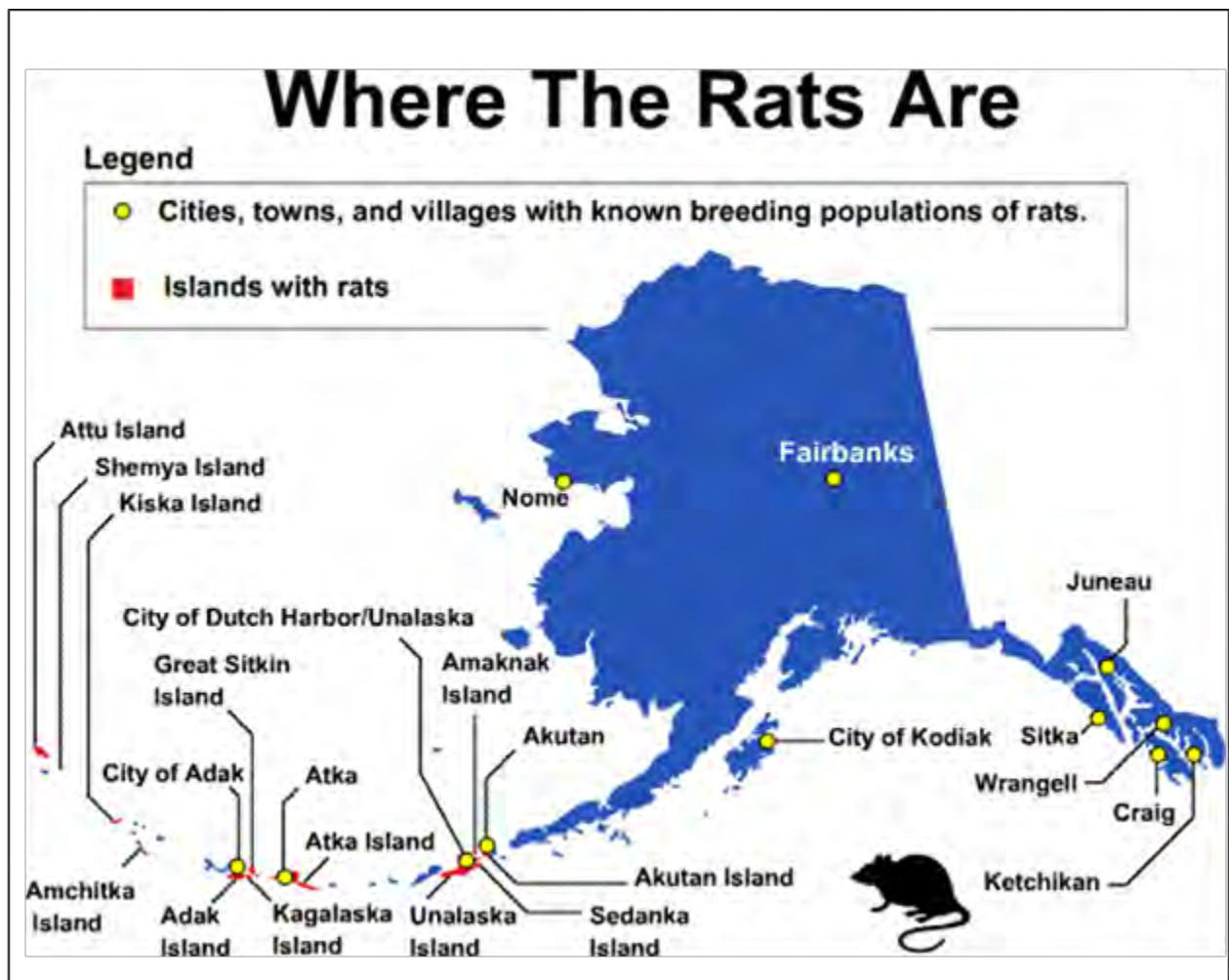
- 1 → Scuttling a vessel may also require USCG and ADEC approval or permits.
- 2 → Consult with NMFS, USFWS, and ADF&G for mitigation measures to minimize
- 3 impacts to wildlife and sensitive habitats.

4 5b. Is there fish or seafood on board?

- 5 NO
- 6 YES → Return to Question 3, above.

7 Please return completed Vessel Grounding or Sinking Response Checklist to the wildlife agencies (see
8 Initial Emergency Contacts).

9 Figure 9-10. Location of Known Breeding Populations of Rats in Alaska. Source: ADF&G [Invasive Species](#)
10 [– Norway Rat \(*Rattus norvegicus*\)](#) webpage.



11
12 Figure 9-11. 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

City, Town, or Village			
Atka	Fairbanks	Kodiak	Wrangell

1 Figure 9-12. Islands in the Alaska Maritime NWR known to have rats. All other islands in the Alaska
 2 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	-	-

3 **9740.3.6 - Rat Prevention Guidelines for Vessels¹²**

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

10 **Be Knowledgeable and Ready**

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

16 **Run a Rat-free Boat**

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

28 **Kill Rats that Get Aboard**

¹² Adapted from information available on the StopRats.org webpage; a standalone version of these guidelines can be found on the ADEC Area Plan References and Tools webpage.

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

12 Speak Up and Spread the Word

- 13 • Tell the harbor masters in the ports you patronize that you expect effective rat prevention as
14 part of the service you pay for.
- 15 • Report rat sightings, and especially a rat invasion of your boat, to the harbor master.
- 16 • Ask about rat control where you store your gear.
- 17 • Spread the word to the fleet.

18 **9740.3.7 - Initiation and Close-Out Forms for ESA Section 7 Consultation**

19 Template forms used by the USCG, NMFS, and USFWS in Alaska for initiating ([Figure 9-12](#)) and
20 concluding ([Figure 9-13](#)) the emergency ESA section 7 consultation for incident response actions follow.

21 Fillable full-page versions of these forms are on the [ADEC Area Plan References and Tools](#) webpage.
22 Please check this website for the most recent versions.

- 1 Figure 9-13. Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7
- 2 Consultation Initiation Form (full-page version available on the [ADEC Area Plan References and Tools](#)
- 3 webpage). Contact NMFS or USFWS for the most recent version.

**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 protection 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 protection measures as feasible without delaying the response. The Services must be notified if actions and techniques change as 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.

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Figure 9-13 continued

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 & Wildlife Service EMAIL: fwsakspillresponse@fws.gov	Cell: 907-242-6893 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		
<i>Check all that apply</i>		
Port/Industrial	<input type="checkbox"/>	NAME/LANDMARKS
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.		
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1

Figure 9-13 continued

**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/vacuuuming			
Barriers/Berms/Fences			
Trenching			
Flooding/Flushing			
Oiled Vegetation Removal			
Debris Removal (oiled & unoiled)			
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.

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1

Figure 9-13 continued

ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT CONSULTATION INITIATION		
Pre-Identified GRS, POR, and PS Sites ³		
TYPE	LOCATIONS(S) SITE IDENTIFIER	REFERENCE FOR PRE-APPROVAL (ACP, ESA sec. 7, etc.)
<i>Example: GRS</i>	<i>Northeast Prince William Sound PWS NE- 27 Granite Cove</i>	<i>Prince William Sound Area Contingency Plan</i>

³ GRS = Geographic Response Strategy, POR = Place of Refuge, PS = Priority Protection Site

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1

Figure 9-13 continued

ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT CONSULTATION INITIATION				
Protected Species Checklist ⁴				
SPECIES ⁵ IN RESPONSE AREA	Check	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 (USFWS) is responsible for listed migratory birds, sea otter, polar bear, and walrus.

⁶ USFWS 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.

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Figure 9-13 continued

ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT CONSULTATION INITIATION		
Check all that apply	ESA Protection Measures⁸	Implemented? Y / N
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.	
<p>⁸ Mitigation Measures, Reasonable & Prudent Measures (RPMs), 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.</p> <p>⁹ Sometimes referred to as "Protected Species Observers."</p>		
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Figure 9-13 continued

ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT CONSULTATION INITIATION		
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		
	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		
<div style="display: flex; justify-content: space-between;"> <i>FOSC Signature</i> <i>Date</i> </div>		
<div style="display: flex; justify-content: space-between;"> <i>Last Revised 8/24/2020</i> <i>7 of 7</i> </div>		

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- 1 Figure 9-14. Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7 Post-
- 2 Response Consultation Close-Out Form (full-page version available on the [ADEC Area Plan References](#)
- 3 [and Tools](#) webpage). Contact NMFS or USFWS for the most recent version.

NMFS # _____	USFWS # _____								
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT									
<p>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</p> <p>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.</p> <p>Emergency Contact: The Services should be contacted as soon as possible by telephone and email at:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">U.S. Fish & Wildlife Service</td> <td style="width: 33%;">fwsakspillresponse@fws.gov</td> <td style="width: 17%;">Cell: 907-242-6893</td> <td style="width: 17%;">Alt: 907-750-8527</td> </tr> <tr> <td>National Marine Fisheries Service</td> <td>sadie.wright@noaa.gov</td> <td>Off: 907-586-7630</td> <td>Cell: 907-957-8147</td> </tr> </table> <p>The Federal On-scene Coordinator (FOSC) 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.</p> <p style="text-align: center;">*IMPORTANT*</p> <p>This consultation has been issued an Environmental Consultation Organizer identification number (ECO#) by NMFS which will remain open until NMFS consultation is complete.</p> <p>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.</p>		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
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						
<p>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.</p>									
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Figure 9-14 continued

NMFS # _____	USFWS # _____									
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT										
TIME & DATE OF TRANSMITTAL:										
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">FROM: FOSC U.S. Coast Guard</td> <td style="width: 40%;">NAME: EMAIL:</td> <td style="width: 30%;">Off.: Cell:</td> </tr> <tr> <td>TO: USFWS <input type="checkbox"/></td> <td>NAME: U.S. Fish & Wildlife Service EMAIL: fwsakspillresponse@fws.gov</td> <td>Cell: 907-242-6893 Alt.: 907-750-8527</td> </tr> <tr> <td>NMFS <input type="checkbox"/></td> <td>NAME: Sadie Wright EMAIL: sadie.wright@noaa.gov</td> <td>Off.: 907-586-7630 Cell: 907-957-8147</td> </tr> </table>	FROM: FOSC U.S. Coast Guard	NAME: EMAIL:	Off.: Cell:	TO: USFWS <input type="checkbox"/>	NAME: U.S. Fish & Wildlife Service EMAIL: fwsakspillresponse@fws.gov	Cell: 907-242-6893 Alt.: 907-750-8527	NMFS <input type="checkbox"/>	NAME: Sadie Wright EMAIL: sadie.wright@noaa.gov	Off.: 907-586-7630 Cell: 907-957-8147	
FROM: FOSC U.S. Coast Guard	NAME: EMAIL:	Off.: Cell:								
TO: USFWS <input type="checkbox"/>	NAME: U.S. Fish & Wildlife Service EMAIL: fwsakspillresponse@fws.gov	Cell: 907-242-6893 Alt.: 907-750-8527								
NMFS <input type="checkbox"/>	NAME: Sadie Wright EMAIL: sadie.wright@noaa.gov	Off.: 907-586-7630 Cell: 907-957-8147								
DESCRIPTION OF RESPONSE: Fill in the information below as completely as possible.										
Included: <input type="checkbox"/> chart or map showing the location of the incident <input type="checkbox"/> 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.)										
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Figure 9-14 continued

NMFS # _____	USFWS # _____
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT	
RESPONSE TIMELINE (Outline the timeline for all response actions taken in response to the incident.)	
PROTECTION MEASURES (Describe all NMFS mitigation measures and recommendations, USFWS recommendations, and when they were incorporated.)	
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1 **9740.3.8 - Wildlife Response Plans (WRPs)**

2 The following sections contain both the Startup and Comprehensive WRP forms (Sections [9740.4.8.1](#)
3 and [9740.4.8.2](#), respectively). Both WRPs include requests to conduct primary, secondary, and tertiary
4 response strategies. For more information about these forms see Section [3650](#).

5 Fillable full-page versions of the Startup and Comprehensive WRPs are on the [ADEC Area Plan](#)
6 [References and Tools](#) webpage. Please check this website for the most recent versions.

7 **9740.3.8.1 - Startup WRP**

8 The Startup WRP ([Figure 9-14](#)) is a request to begin the process of authorizing all or some portion of
9 wildlife response strategies to be conducted for up to 72 hours after the start of a spill response. Pre-
10 emptive capture may only be requested using a Comprehensive WRP (i.e., a Startup WRP may not be
11 used to request pre-emptive capture; see Sections 3640.2.2.2, [3650.2](#), and [9740.4.8.2](#)). For more
12 information about the Startup WRP form see Section [3650.1](#).

13 Fillable full-page versions of the Startup WRP are on the [ADEC Area Plan References and Tools](#) webpage.
14 Please check this website for the most recent versions.

1 Figure 9-15. Startup Wildlife Response Plan (WRP) (17 pages; full-page version available on the [ADEC](#)
 2 [Area Plan References and Tools](#) webpage).

STARTUP Wildlife Response Plan		
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"/> Pre-Issued ADF&G Wildlife Response Permits	
<input type="checkbox"/> Incident Status Summary (ICS 209) or narrative	<input type="checkbox"/> Pre-Issued USFWS permits (attach first page with Permit No.) or authorizations	
<input type="checkbox"/> Resources at Risk (ICS 232)	<input type="checkbox"/> Pre-Issued NMFS authorizations (attach first page with Authorization No.)	
<input type="checkbox"/> ESA section 7 consultation documents		
<input type="checkbox"/> Completed Wildlife Observation Forms		
<input type="checkbox"/> Other _____		
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:	
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Figure 9-15 continued

STARTUP Wildlife Response Plan		
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/did/talcoast/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 ¹ UAS = unmanned aerial/aircraft system, "drones" USFWS = U.S. Fish and Wildlife Service WPG = Wildlife Protection Guidelines for Oil Spill Response in Alaska WRP = Wildlife Response Plan	
¹ "RP/PRP" includes any entity contracted by the RP/PRP (or their OSRO/PRAC for the response) and is intended to include the RP/PRP, their contractors, the permittee, or whomever is directly responsible for carrying out this plan.		
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Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part A – Species and Habitats				
This section to be filled out by RP/PRP.				
<p>Instructions: All questions must be answered by checking the 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., 1.) or reference and include applicable attachments. Fill this form out with the best available information with as much detail as possible. In some incidents, specific numbers of species may be available from actual observations and would be reported, for example, as “3 Cook Inlet beluga whales,” whereas if best available information is used to estimate numbers for an area known to support high concentrations of migratory birds, it could be reported as “tens of thousands” of “waterfowl, seabirds, and shorebirds.” Use as much space as needed on this form or a separate document can be attached. 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.</p>				
SPECIES AND HABITATS				
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, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
<p style="text-align: center; font-size: small;"><i>Migratory birds</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Eagles</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Non-migratory birds</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p>	<p style="text-align: center; font-size: small;"><i>Sea otters</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Walruses</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Polar bears</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p>	<p style="text-align: center; font-size: small;"><i>Whales</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Seals</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Sea lions</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Porpoises or Dolphins</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p>	<p style="text-align: center; font-size: small;"><i>Brown or black bears</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Ungulates</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Furbearers</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p>	<p style="text-align: center; font-size: small;"><i>Fish</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Shellfish</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p> <hr/> <p style="text-align: center; font-size: small;"><i>Invertebrates</i></p> <p style="text-align: center; font-size: small;"><input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>How many? _____</p> <p style="text-align: center; font-size: small;">Which species?</p> <p>_____</p>
continued on next page				
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Figure 9-15 continued

STARTUP Wildlife Response Plan					
IV. Request for Startup of Wildlife Response Strategies					
Part A – Species and Habitats (continued)					
Species and Habitats	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
<p><i>ESA-listed Species</i></p> <p>What ESA-listed species or critical habitat are or may be in the area?</p>					
<p><i>All Wildlife</i></p> <p>Where/how close are wildlife to the spill and trajectory?</p>					
<p><i>All Wildlife</i></p> <p>Which sensitive life stages or habitats could be affected by the spill or by the response activities?</p>	<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
<p><i>continued on next page</i></p>					
<p>Wildlife Protection Guidelines, version 2020.1</p>					

Figure 9-15 continued

STARTUP Wildlife Response Plan					
IV. Request for Startup of Wildlife Response Strategies					
Part B – Proposed Response Strategies					
Primary Response Strategy – Carcass Collection	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	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 or Dolphins <input type="checkbox"/> YES <input type="checkbox"/> NO		
IF YES for any species, complete A through H in Part C – Supporting Information for Proposed Response Strategies under 1. Primary Response Strategy.					
Secondary Response Strategy – Hazing/Deterrence	Migratory Birds, Eagles, or Non-Migratory Birds	Sea otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	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 or Dolphins <input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> PASSIVE ONLY	
			<input type="checkbox"/> PASSIVE ONLY		
IF YES for any species, complete A through H in Part C – Supporting Information for Proposed Response Strategies under 2. Secondary Response Strategy.					

continued on next page

Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part B – Proposed Response Strategies (continued)				
Tertiary Response Strategy – Capture, Transport, Stabilization, Rehabilitation	Migratory Birds, Eagles, or Non-Migratory Birds	Sea otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
3. Is capture, transport, stabilization, or rehabilitation proposed within 72 hours after the start of the spill?	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 or Dolphins <input type="checkbox"/> YES <input type="checkbox"/> NO	
If YES for any species, complete A through J in Part C – Supporting Information for Proposed Response Strategies under 3. Tertiary Response Strategy.				
continued on next page (if any YES)				

Figure 9-15 continued

STARTUP Wildlife Response Plan

IV. Request for Startup of Wildlife Response Strategies <i>Part C – Supporting Information for Proposed Response Strategies</i>					
1. Primary Response Strategy – Carcass Collection	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
<p>A. Status of permits and authorizations for carcass collection? > If pre-issued, list permit or authorization number.</p>	<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
<p>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?</p>					
<p>C. What equipment will be used for carcass collection activities? > When will it arrive at the field/spill site?</p>					
<p>D. How will carcasses be transported from the field to the morgue or staging area? > When will transportation be fully operational?</p>					

continued on next page

Figure 9-15 continued

STARTUP Wildlife Response Plan					
IV. Request for Startup of Wildlife Response Strategies					
Part C – Supporting Information for Proposed Response Strategies (continued)					
1. Primary Response Strategy – Carcass Collection (continued)	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers	Fish, Shellfish, or Invertebrates
E. Where will the morgue be established? ➤ 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 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.					

Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part C – Supporting Information for Proposed Response Strategies (continued)				
2. Secondary Response Strategy – Hazing/Deterrence	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
A. Status of permits and authorizations for hazing/deterrence? ➤ 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 nests	<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?				

continued on next page

Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part C – Supporting Information for Proposed Response Strategies (continued)				
2. Secondary Response Strategy – Hazing/Deterrence (continued)	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
<p>D. Who will conduct deterrence/hazing activities (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple.</p> <ul style="list-style-type: none"> ➤ 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? 				

continued on next page

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Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part C – Supporting Information for Proposed Response Strategies (continued)				
2. Secondary Response Strategy – Hazing/Deterrence (continued)	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
E. When is deterrence/hazing expected to begin (be as accurate as possible)?				
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.				

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Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part C – Supporting Information for Proposed Response Strategies (continued)				
3. Tertiary Response Strategy – Capture, Transport, Stabilization, Rehabilitation	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	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?				

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Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part C – Supporting Information for Proposed Response Strategies (continued)				
3. Tertiary Response Strategy – Capture, Transport, Stabilization, Rehabilitation (continued)	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
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.				

continued on next page

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Figure 9-15 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
<i>Part C – Supporting Information for Proposed Response Strategies (continued)</i>				
3. Tertiary Response Strategy – <i>Capture, Transport, Stabilization, Rehabilitation (continued)</i>	Migratory Birds, Eagles, or Non-Migratory Birds	Sea Otters, Walruses, or Polar Bears	Whales, Seals, Sea Lions, Porpoises, or Dolphins	Brown or Black Bears, Ungulates, or Furbearers
G. Will a temporary stabilization facility be set up? If so, ➤ Where will it be located? ➤ 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?				

1

Figure 9-15 continued

STARTUP Wildlife Response Plan						
V. Wildlife Agency Permits and Authorizations for Proposed Response						
<i>This section to be filled out by wildlife agencies.</i>						
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					
Walrus	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 or dolphins	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

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Figure 9-15 continued

STARTUP Wildlife Response Plan	
VI. Additional Conditions	
<i>This section to be filled out by wildlife agencies.</i>	
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	
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
Secondary Response Strategies – Hazing/Deterrence	
<input type="checkbox"/>	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.
<input type="checkbox"/>	Hazing/deterrence may not occur in areas where molting waterfowl are observed.
<input type="checkbox"/>	Hazing/deterrence may not occur within _____ m (_____ ft) of _____.
<input type="checkbox"/>	Report observations of _____ to _____.
<input type="checkbox"/>	Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
<input type="checkbox"/>	Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
<input type="checkbox"/>	Hazing/deterrence activities must be monitored by one or more Wildlife Observers (see WPG Tactic Wildlife Reconnaissance), as needed.
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
Tertiary Response Strategies – Capture, Transport, Stabilization, and Rehabilitation	
<input type="checkbox"/>	Report observations of _____ to _____.
<input type="checkbox"/>	Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
<input type="checkbox"/>	Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
<input type="checkbox"/>	Tertiary response activities must be monitored by a Wildlife Observer (see WPG Tactic Wildlife Reconnaissance).
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____

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1 **9740.3.8.2 - Comprehensive WRP**

2 The Comprehensive WRP ([Figure 9-15](#)) 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 this
5 form, see Section [3650.2](#).

6 Fillable full-page versions of the Comprehensive WRP can be found on the [ADEC Area Plan References](#)
7 [and Tools](#) webpage. Check this website for the most recent versions.

1 Figure 9-16. Comprehensive Wildlife Response Plan (WRP) (16 pages; full-page version available on the
 2 [ADEC Area Plan References and Tools](#) webpage).

Comprehensive Wildlife Response Plan		
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"/> Startup WRP	
<input type="checkbox"/> Incident Status Summary (ICS 209) or narrative	<input type="checkbox"/> Pre-Issued ADF&G Wildlife Response Permit(s)	
<input type="checkbox"/> Resources at Risk (ICS 232)	<input type="checkbox"/> Pre-Issued USFWS permits (attach first page with Permit No.) or authorizations	
<input type="checkbox"/> ESA section 7 consultation documents	<input type="checkbox"/> Pre-Issued NMFS authorizations (attach first page with Authorization No.)	
<input type="checkbox"/> Completed Wildlife Observation Forms		
<input type="checkbox"/> Other _____		
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):		
<i>Federal On-Scene Coordinator must also inform NRDAR Liaison.</i>		
Signature:		
Time:	Date:	
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Figure 9-16 continued

Comprehensive Wildlife Response Plan		
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 BIA = Biologically Important Area (https://coast.noaa.gov/digitalcoast/data/biologicallyimportantareas.html) DPS = Distinct Population Segment 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	NRDAR = Natural Resource Damage Assessment and Restoration OLE = Office of Law Enforcement OSRO = Oil Spill Removal/Recovery Organization PRAC = Primary Response Action Contractor RP/PRP = Responsible Party/Potential Responsible Party ¹ UAS = unmanned aerial/aircraft system, "drones" USFWS = U.S. Fish and Wildlife Service WPG = Wildlife Protection Guidelines for Oil Spill Response in Alaska WRP = Wildlife Response Plan	
¹ "RP/PRP" includes any entity contracted by the RP/PRP (or their OSRO/PRAC for the response) and is intended to include the RP/PRP, their contractors, the permittee, or whomever is directly responsible for carrying out this plan.		
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Figure 9-16 continued

Comprehensive 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 a 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			
Species Group	Yes		Primary	Secondary	Pre-emptive Capture	Tertiary
			Carcass Collection	Haze/Deter		Capture and Rehab
			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 otters (Southcentral or Southeast Alaska stocks)	<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 seals	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steller sea lions Eastern DPS	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mink, 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"/>

Figure 9-16 continued

Comprehensive Wildlife Response Plan						
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 in cooperation with available experts and agency representatives. Part B is for species listed under the ESA.						
1. Is a species known or expected to be present in the spill area?		2. If YES, list specific species information:	3. Identify Proposed Response Strategies			
Species	Yes		Primary Carcass Collection	Secondary Haze/Deter	Pre-emptive Capture	Tertiary Capture and Rehab
Species	Yes	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"/>

Figure 9-16 continued

Comprehensive Wildlife Response Plan	
V. Other Primary Response Actions	
<i>This section to be filled out by the RP/PRP.</i>	
Instructions: Check any primary response actions underway or previously taken: (1) to protect wildlife and/or wildlife habitat, <u>and</u> (2) which may affect the proposed wildlife response activities. Describe any additional actions underway or previously taken.	
<input type="checkbox"/>	Control and contain the source of the spill.
<input type="checkbox"/>	Mechanical recovery (boom, skimmers, etc.).
<input type="checkbox"/>	Sensitive area protection (booming of anadromous streams, marine mammal haulouts, seabird rookeries, etc.).
<input type="checkbox"/>	Non-mechanical recovery (dispersants or <i>in-situ</i> burning)
<input type="checkbox"/>	Removal of oiled debris (kelp, driftwood, etc.)
<input type="checkbox"/>	Other: _____
<input type="checkbox"/>	Other: _____

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
VI. Carcass Collection Plan	
<i>This section to be filled out by the RP/PRP.</i>	
<p>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, number, and species group (e.g., Section VI. 10. Seals) or reference and include applicable attachments.</p>	
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 (RP/PRP staff, contractors, agency staff, OSRO/PRAC)? List all if multiple.
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 and when 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.)? When will it be operational? 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 (e.g., submitted ICS form 213RR)? 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?
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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
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:	

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
VII. Hazing/Deterrence Plan	
<i>This section to be filled out by the RP/PRP.</i>	
<p>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, number, and species group (e.g., Section VII. 2. Seals) or reference and include attachments.</p>	
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, including affiliation, names (if known), and person in charge (with ICS position) of deterrence activities. When will they arrive at the field/spill site?
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.
<div style="display: flex; justify-content: space-between;"> Wildlife Protection Guidelines version 2020.1 Page 8 of 16 </div>	

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
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:	

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
VIII. Pre-emptive Capture Plan	
<i>This section to be filled out by the RP/PRP.</i>	
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, number, and species group (e.g., Section VIII. 1. Seals) 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.

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
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:	

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
IX. Capture, Transport, Stabilization, Rehabilitation, and Release Plan	
<i>This section to be filled out by the RP/PRP.</i>	
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, number, and species group (e.g., Section IX. 1. Seals) 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. When will they arrive at the site? _____
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 each 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). 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. _____
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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
Summary of Wildlife Agency Comments: Section IX. Capture, Transport, Stabilization, Rehabilitation, and Release 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:	

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Figure 9-16 continued

Comprehensive Wildlife Response Plan						
X. Wildlife Agency Permits and Authorizations for Proposed Response						
<p><i>This section to be filled out by wildlife agencies.</i></p> <p>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).</p> <p>Response activities for each species group as proposed in Sections VI – IX of this form may begin as soon as all necessary permits and approvals for that species group are listed as Initiated, Issued, or Emergency.</p>						
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					
Walrus	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/dolphins	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

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Figure 9-16 continued

Comprehensive Wildlife Response Plan	
XI. Additional Conditions	
<i>This section to be filled out by wildlife agencies.</i>	
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:	
<u>Primary Response Strategies – Carcass Collection</u>	
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<u>Secondary Response Strategies – Hazing/Deterrence</u>	
<input type="checkbox"/>	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.	
<input type="checkbox"/>	Hazing/deterrence may not occur in areas where molting waterfowl are observed.
<input type="checkbox"/>	Hazing/deterrence may not occur within _____ m (_____ ft) of _____.
<input type="checkbox"/>	Report observations of _____ to _____.
<input type="checkbox"/>	Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
<input type="checkbox"/>	Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
<input type="checkbox"/>	Hazing/deterrence activities must be monitored by one or more Wildlife Observers (see WPG Tactic Wildlife Reconnaissance) as needed.
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
<u>Tertiary Response Strategies – Capture, Transport, Stabilization, and Rehabilitation</u>	
<input type="checkbox"/>	Report observations of _____ to _____.
<input type="checkbox"/>	Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team).
<input type="checkbox"/>	Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network).
<input type="checkbox"/>	Tertiary response activities must be monitored by a Wildlife Observer (see WPG Tactic Wildlife Reconnaissance).
<input type="checkbox"/>	_____
<input type="checkbox"/>	_____
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1 **9740.4 - Local Contact Signs**

2 Figure 9-17. On-Island Oiled Wildlife Contacts: Saint Paul Island.

NOTICE

If you see wildlife that are oiled or may have been oiled, contact one of the following:

Ecosystem Conservation Office (ECO)

(General) 907-546-3200

(Direct) 907-546-3226

Paul Melovidov (Island Sentinel)

(Cell) 907-546-4030

Lauren Divine (Director, ECO)

(Cell) 907-891-3031

City of Saint Paul (General Line)

Department of Public Safety

911

907-202-8586 or 907-546-3130

Dennis Bourdukofsky (TDX)

(Wk) 907-546-2312

(Wk) 907-546-4103

(Hm) 907- 546-2220

1 Figure 9-18. On-Island Oiled Wildlife Contacts: St. George Island.

NOTICE

If you see wildlife that are oiled or may have been oiled, contact one of the following:

St. George Traditional Council

Primary Contact:
Mark Merculief, Jr.
(Wk) 907-859-2447
(Hm) 907-859-2324

Alternate Contact:
Darlene Lekanof
(Wk) 907-859-2241
(Hm) 907-859-2250

St. George Tanaq Corporation
Todd Lestenkof
(Wk) 907-859-2255

City of St. George

Primary Contact:
Mark Merculief, Jr (Mayor)
(Wk) 907-859-2263
(Hm) 907-859-2324

Alternate Contact:
Grace Merculief (Administrator)
(Wk) 907-859-2263

1 **9740.5 - NMFS Marine Mammal Emergency Response Standards**

2 National Marine Fisheries Service (NMFS) Alaska Region
3 Statewide Marine Mammal Spill Preparedness and Response Structure;
4 Expectations for Responsible Parties

5 Prepared June 2017

6 The Oil Pollution Act of 1990 (OPA-90) expanded the federal government's ability to prevent and
7 respond to oil spills. OPA-90 established new requirements for contingency planning by government and
8 industry by expanding the National Contingency Plan to a three-tiered system: 1) the federal
9 government, through the National and Regional Response Team(s) were empowered to direct all public
10 and private response efforts for certain types of spill events through their corresponding Response
11 Plans; 2) Area Committees (composed of federal, state, and local government officials) were required to
12 develop detailed, location-specific Area Contingency Plans; and 3) owners or operators of vessels and
13 certain facilities that pose a serious threat to the environment must prepare their own Facility Response
14 Plans.

15 In an effort to assist with emergency response preparedness for marine mammals under NMFS
16 jurisdiction in Alaska, the NMFS Alaska Region Protected Resources Division (AKR PRD) has developed
17 the following general guidelines and standards for response capacity by responsible parties.

- 18 • Preparedness and Response Standards and Thresholds (Initial Immediate Response)
 - 19 ○ Samples: Prepare to sample 50 live or dead pinnipeds (i.e., bearded seal, harbor seal,
20 ribbon seal, ringed seal, spotted seal, northern fur seal, and/or Steller sea lion) the first
21 week. Prepare to sample 5 live or dead cetaceans (i.e., whales and porpoise) the first
22 week. After the first week, the Responsible Party (RP) has the responsibility to fund the
23 storage of carcasses, fund transport to approved facilities for analysis, and fund
24 additional sampling or any live or dead pinnipeds or cetaceans. Sampling shall be
25 performed by an individual or entity approved under NMFS Marine Mammal Health and
26 Stranding Permit #18786.
 - 27 ○ Necropsy: Prepare to necropsy 50 dead pinnipeds and/or cetaceans. Necropsies shall be
28 performed and samples stored by an individual or entity approved under NMFS Marine
29 Mammal Health and Stranding Permit #18786. If mortalities exceed 50 animals, the RP
30 has the responsibility to fund the storage of carcasses and fund transport to approved
31 facilities for analysis.
 - 32 ○ Sample storage: Maintain level of readiness to store 1,000 marine mammal samples,
33 which likely includes multiple samples from individual animals, and therefore, does not
34 represent 1,000 animals. Samples shall be stored by an individual or entity approved
35 under NMFS Marine Mammal Health and Stranding Permit #18786.
 - 36 ○ Cleaning/rehabilitation threshold: The following thresholds apply for live moribund
37 animals whose condition can withstand transport.
 - 38 ■ Pinnipeds: The RP should maintain a level of readiness for 25 live pinnipeds to
39 be cleaned and rehabilitated.
 - 40 • This applies to bearded, ringed, ribbon, spotted, harbor, and northern
41 fur seals and Steller sea lions. However, capturing and cleaning oiled
42 adult Steller sea lions is generally not feasible given their size and the

- 1 difficulties in their collection and transport, as well as danger to
2 response personnel.
- 3 • It may not be feasible to capture oiled northern fur seals. Human safety
4 must be a primary consideration as it may be dangerous to response
5 personnel to capture oiled fur seal pups because of territorial bulls, and
6 oiled adult fur seals would be extremely dangerous to handle, even if
7 partially debilitated. Also, separating a pup from its mother temporarily
8 may lead to abandonment.
 - 9 • Approved cleaning protocols and practices by species can be found in
10 the Wildlife Protection Guidelines in the Alaska Unified Response Plan
11 and NMFS National Marine Mammal Oil Spill Guidelines.
 - 12 • All cleaned pinnipeds must be tagged prior to release to monitor
13 survivorship. Per a request from the Ice Seal Committee, we
14 recommend that ice seals which are transported outside their region of
15 capture not be released back to the wild after rehabilitation. This
16 request does not apply to ice seals captured and cleaned on-site.
 - 17 ▪ Cetaceans: The RP should maintain a level of readiness for two live small
18 cetaceans (e.g., young beluga whale, young killer whale, or porpoise) to be
19 cleaned and rehabilitated.
- 20 ○ Readiness Time Horizon
 - 21 ▪ Maintain readiness for additional sampling, necropsies, sample storage, and
22 cleaning/rehabilitation for up to one year post-spill.
 - 23 ▪ After the official closure of a spill response, RPs should remain prepared to
24 support NMFS and wildlife response organizations to respond to oil-affected
25 marine mammals under NMFS jurisdiction.
 - 26 ○ Authority
 - 27 ▪ Response authority for oiled marine mammals under NMFS jurisdiction is always
28 retained by NMFS, and interventions can be authorized only by NMFS on a case
29 by case basis. During a spill, authority to respond to oiled marine mammals may
30 be granted under the NMFS Marine Mammal Health and Stranding Response
31 Permit #18786 issued to Dr. Teri Rowles and her authorized NMFS Co-
32 Investigators. Pre-authorization is not a component of this response structure.
 - 33 ▪ Work cooperatively with the NMFS and the USCG in a hazardous waste spill (i.e.,
34 oil spills) ICS, if implemented. If you do not want to work cooperatively with
35 NMFS and the USCG during a hazardous waste spill, you should notify the NMFS
36 Regional Administrator as part of your application for a Stranding Agreement, or
37 minimally in writing within 5 days of a request from the NMFS Regional
38 Stranding Coordinator during an ongoing spill response.
 - 39 ▪ In certain circumstances (e.g., oil spill, listed or rare species stranding, UME,
40 possible human interaction case, extralimital or out-of-habitat situation), the
41 NMFS Regional Stranding Coordinator may request necropsies be conducted by
42 a Necropsy Team Leader, a specific sampling protocol be followed, samples be
43 stored in a certain manner or location, or that there be additional and expedited

1 reporting (verbal or written) of Level B and C data, such as analytical results and
2 necropsy reports, if available. NMFS will not reproduce, modify, distribute, or
3 publish data submitted under this section without consent of the Participant
4 unless required to release the data under Federal law or order (such as the
5 Freedom of Information Act).

6 ○ Spill Response Network Model

- 7 ▪ Preparedness and response shall be led through a NMFS approved contractor
8 (e.g., Alaska SeaLife Center [ASLC]) under U.S. Coast Guard’s Oil Spill Removal
9 Organization (OSRO) program, after obtaining authorization through NMFS
10 permit #18786. NMFS will provide guidance regarding: 1) marine mammal
11 response standards, 2) training requirements, and 3) regulatory pathways for
12 response authorizations (e.g., authorizing marine mammal responses pursuant
13 to NMFS permit #18786). NMFS will maintain contact information on trained
14 stranding network members and Incident Command System staff. NMFS-
15 approved wildlife responders will facilitate preparedness for the stranding
16 network as a primary field response participant, along with trained stranding
17 network members. OSROs will need to work with NMFS-approved wildlife
18 response organizations to ensure preparedness levels are sufficient for a rapid
19 response to oiled marine mammal under NMFS jurisdiction. Currently, NMFS
20 does not have the in-house capacity to lead field efforts, so will act in a guidance
21 and oversight capacity through the Wildlife Protection Branch.

22 ○ Adding Stranding Agreement Holders

- 23 ▪ NMFS will continue to approach qualified entities and individuals throughout
24 Alaska to encourage participation and engagement in the Alaska Marine
25 Mammal Stranding Network. A focused effort is underway to further develop
26 response capacity in the Kodiak and Cook Inlet regions. Training will need to be
27 provided to new stranding network members at annual stranding network
28 meeting or by other mechanisms.