



Pribilof Islands Wildlife Protection Guidelines for Oil Spill Response



**Wildlife
Protection
Committee**

**Pribilof Islands
Working Group**

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ACRONYMS & ABBREVIATIONS

AAC	Alaska Administrative Code
ACP	Area Contingency Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
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 ACP	Arctic and Western Alaska Area Contingency Plan
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
DOC	U.S. Department of Commerce
DOI	U.S. Department of the Interior
DMLW	Alaska Division of Mining, Land and Water
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

HOW TO USE THE PRIBILOF ISLANDS WILDLIFE PROTECTION GUIDELINES

The *Pribilof Islands Wildlife Protection Guidelines for Oil Spill Response* (PI WPG) provides spill responders the tools and background information needed to address wildlife concerns during a spill response in the Pribilof Islands. Users of the PI WPG should be familiar with the *Incident Command System (ICS) in Oil Spill Response*, available from the [Homeland Security Digital Library](#); the oil spill response planning structure outlined in the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP; particularly 40 CFR § 300.210, .600, and .175, which discuss wildlife response, designation of federal trustees, and federal agency responsibilities, respectively; available at this [EPA webpage](#)); the *Alaska Regional Contingency Plan* (Alaska RCP); and the *Arctic and Western Alaska Area Contingency Plan* (AWA ACP). The *Alaska RCP* and *AWA ACP* are available on the Alaska Department of Environmental Conservation (ADEC) [Regional Contingency Plan](#) webpage.

The PI WPG provides additional site-specific details to the *Wildlife Protection Guidelines for Oil Spill Response in Alaska* (Alaska WPG), which is the Alaska Regional Response Team (ARRT) Wildlife Protection Committee (WPC) document that addresses wildlife concerns throughout Alaska. The Alaska WPG document is available at this [ADEC webpage](#). The PI WPG contains information specific to the Pribilof Islands and refers to the WPG for information that applies to wildlife response in Alaska more broadly. We have also included Appendices 9740.1 to 9740.3 from the Alaska WPG (version 2020.1) in this document for user convenience; during an incident, check the ADEC webpage for the most current version of the Alaska WPG. The PI WPG provides useful guidance for spill response related to northern fur seals and other wildlife on Bogoslof Island as well as the Pribilof Islands.

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

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

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

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

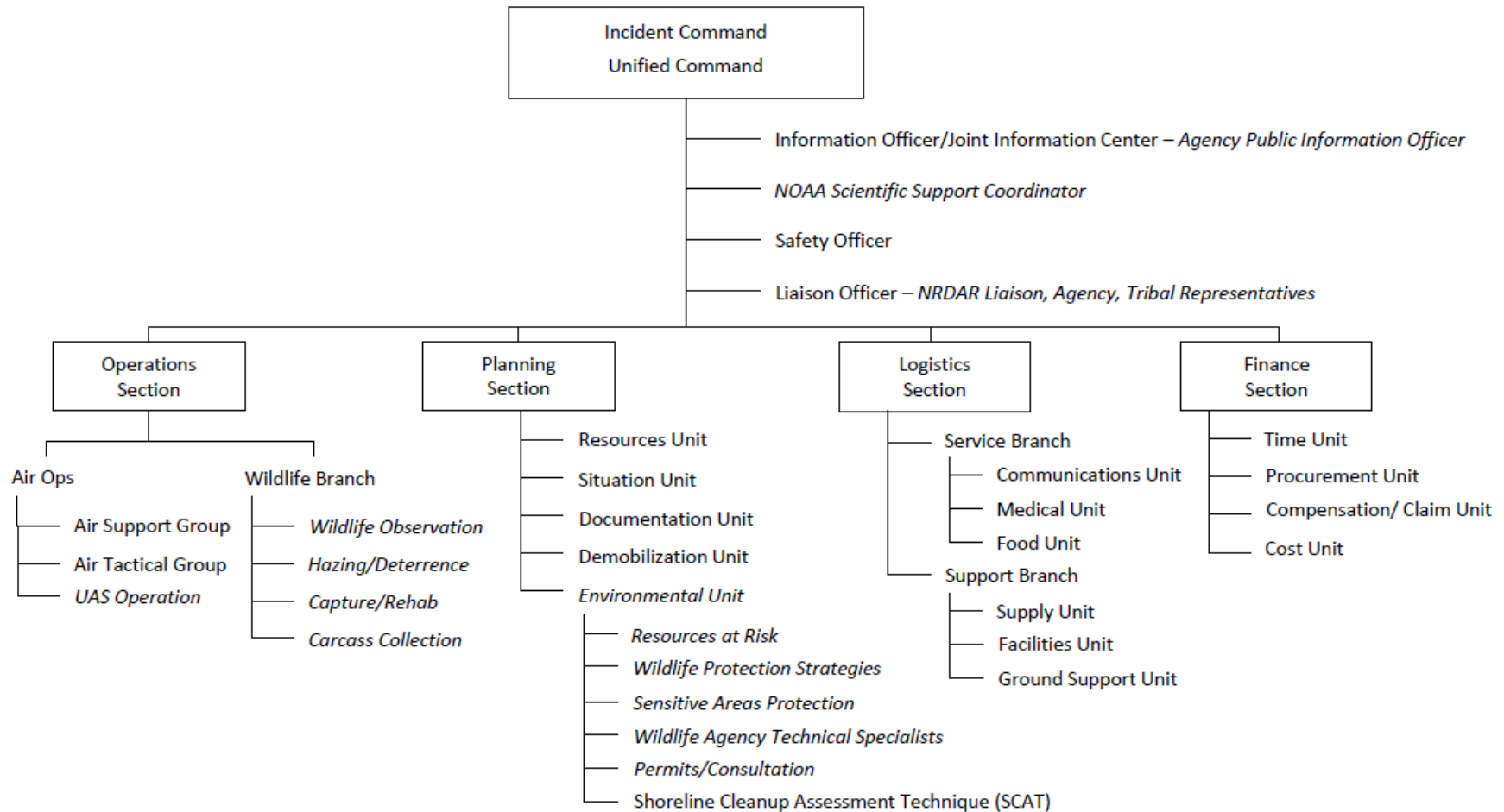
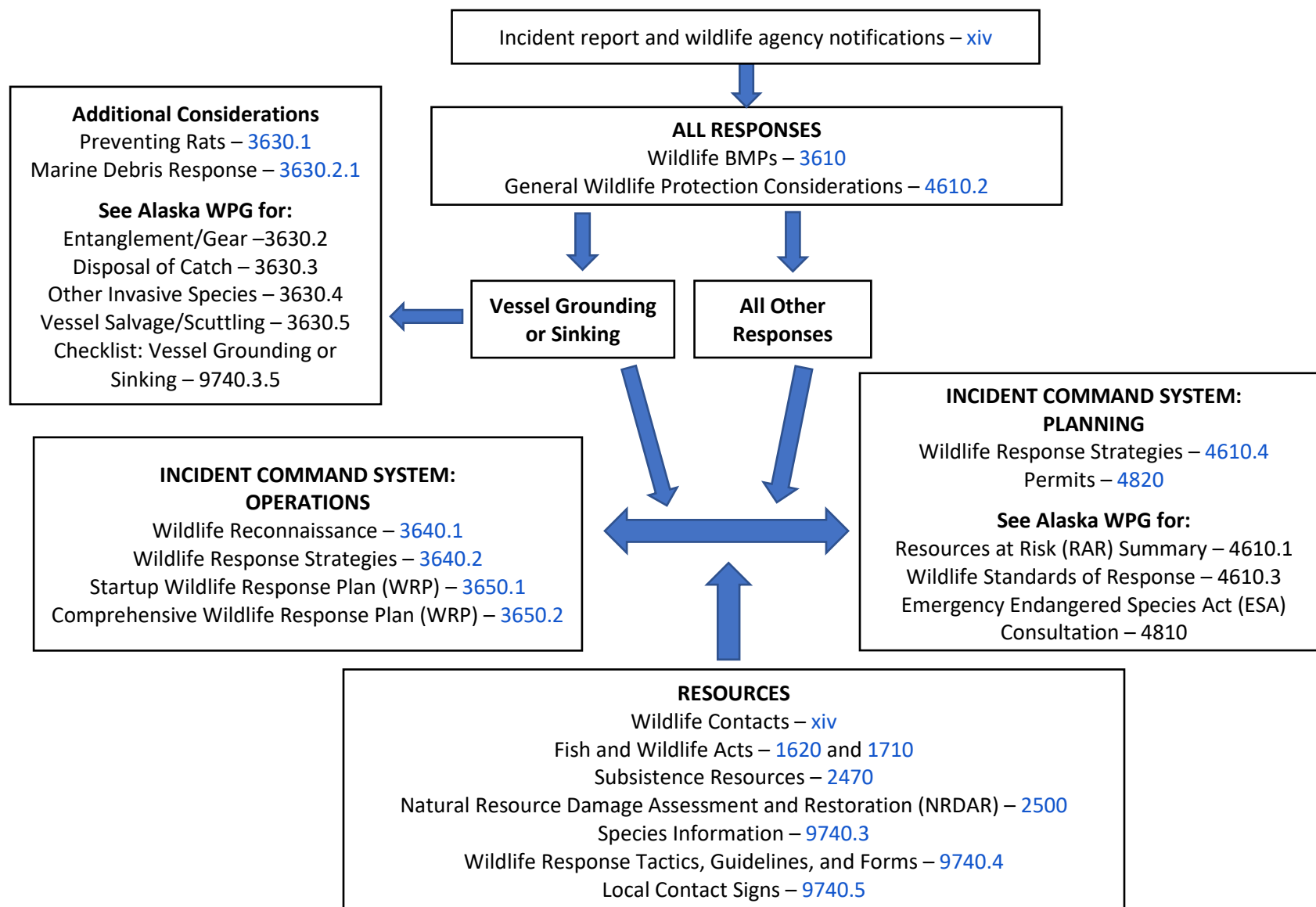


Figure i-2. Flow chart showing the sections of the PI WPG or Alaska WPG to access detailed information on the listed topics.



WILDLIFE CONTACTS

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

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

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

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

1000 - INTRODUCTION

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

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

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

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

1600 - NATIONAL POLICY AND DOCTRINE

1610 - Relationship to National Planning Requirements and Guidance

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

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

1620 - Fish and Wildlife Acts Compliance

Under federal statutes, the U.S. Department of Interior's (DOI) U.S. Fish and Wildlife Service (USFWS) has responsibility for managing and protecting migratory birds under the Migratory Bird Treaty Act (MBTA); eagles under the Bald and Golden Eagle Protection Act (BGEPA); Endangered Species Act (ESA)-listed birds; walrus, polar bears, and sea otters under the Marine Mammal Protection Act (MMPA); and polar bears and some populations of sea otters under the ESA. The U.S. Department of Commerce's (DOC) National Marine Fisheries Service (NMFS) has responsibility for managing and protecting all other marine mammals under the MMPA and ESA, and marine fishes and invertebrates under the ESA and Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA). Also under the MSFCMA, the NMFS Habitat Conservation Division is required to coordinate with industries, stakeholder groups, government agencies, and private citizens to avoid, minimize, or offset the adverse effects of human activities on Essential Fish Habitat and living marine resources in Alaska.

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

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

1620.1 - Migratory Bird Treaty Act (MBTA)

1620.2 - Marine Mammal Protection Act (MMPA)

1620.3 - Endangered Species Act (ESA)

1620.4 - Bald and Golden Eagle Protection Act (BGEPA)

1620.5 - Fur Seal Act

1620.6 - Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA)

1620.7 - Non-Indigenous Aquatic Nuisance Prevention and Control Act (NANPCA) and National Invasive Species Act (NISA)

1630 - Federal Wildlife Response Guidance

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

Arctic Marine Mammal Disaster Response Guidelines

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

Best Practices for Migratory Bird Care during Oil Spill Response

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

Cook Inlet and Kodiak Marine Mammal Disaster Response Guidelines

National Marine Fisheries Service. 2019. NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines. U.S. DOC, NOAA Technical Memorandum NMFS-F/AKR-22. 80 p. + appendices. Available from the [NOAA Institutional Repository](#).

Emergency Care and Rehabilitation of Oiled Sea Otters

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

Pinniped and Cetacean Oil Spill Response Guidelines (National Guidelines)

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

1700 - ALASKA STATUTES AND REGULATIONS

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

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

1710.1 - Fish Habitat Permit

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

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

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

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

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

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

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).

1710.3 - Aquatic Resource Permit

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

2000 - COMMAND

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

2400 - Liaison Officer

2470 - Subsistence Resources

2500 - Natural Resource Damage Assessment and Restoration (NRDAR)

2510 - Coordinating Carcass Collections

2520 - Coordinating Marine Debris Response

2400 - Liaison Officer

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

2470 - Subsistence Resources

“Subsistence is sustenance for the life.”³

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

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

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

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

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

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

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

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

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

2500 - Natural Resource Damage Assessment and Restoration (NRDAR)

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

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

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

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

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

2510 - Coordinating Carcass Collections

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

See Section 2510 of the Alaska WPG for additional information.

2520 - Coordinating Marine Debris Response

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

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

3000 - OPERATIONS

3600 - Wildlife Operations

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

3610 - Wildlife Response Best Management Practices (BMPs)

3620 - General Wildlife Protection Considerations

3630 - Vessel Grounding or Sinking Response

3630.1 - Preventing Rat Introduction to the Pribilof Islands

3630.2 - Entanglement and Fishing Gear

3640 - Wildlife Branch (WB)

3640.1 - Wildlife Reconnaissance (Recon)

3640.1.1 - Authorizations and Permits for Wildlife Recon

3640.2 - Wildlife Response Strategies

3650 - Request for Wildlife Response Activities

3650.1 - Startup Wildlife Response Plan (WRP)

3650.2 - Comprehensive Wildlife Response Plan (WRP)

3650.3 - Inadvertent Impacts of Wildlife Response Activities

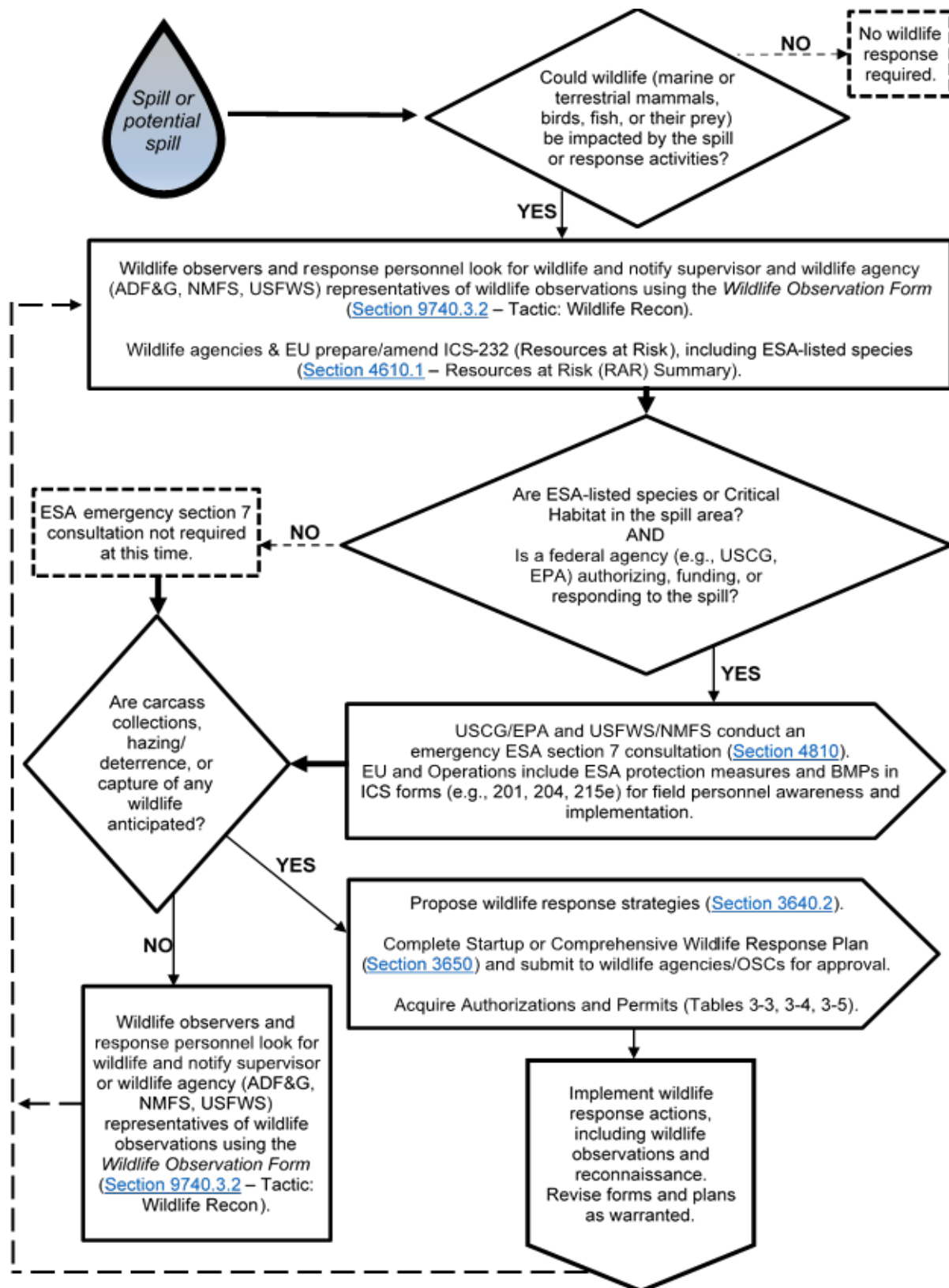


Figure 3-1. Wildlife response flow chart for major wildlife response decisions, agency notifications, and initial forms/applications (reproduced from the Alaska WPG).

3610 - Wildlife Response Best Management Practices (BMPs)

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

In addition, wildlife agency representatives will provide guidance to mariners and response personnel on actions they can take to minimize impacts to wildlife, such as remaining at a certain distance from migratory bird or marine mammal concentration areas and sensitive habitats, including seabird cliffs or northern fur seal haulouts. 50 CFR § 216.81 prohibits people from accessing fur seal rookeries and hauling grounds from June 1 to October, unless authorized or accompanied by a representative of NMFS. Additionally, 50 CFR § 216.85 states that Executive Order 1044, dated February 27, 1909, set aside Walrus and Otter Islands as bird reservations. People are therefore prohibited from landing on those islands unless authorized by the appropriate NMFS representative.

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

Wildlife response Best Management Practices (BMPs) were developed as measures to reduce impacts to wildlife and their habitats during an oil spill response and for responder safety. These should be considered general guidance during spill responses. Not all BMPs will be applicable to every response, which is why incident-specific guidance is developed through the ESA section 7 consultation process and the Startup and Comprehensive WRPs. The best available information and professional judgment should be used when determining how to implement these BMPs during each response. Wildlife Response BMPs are available in Section [9740.4.1](#) and as a standalone document on the ADEC [Area Plan References and Tools](#) webpage.

3620 - General Wildlife Protection Considerations

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

- Introducing Rats to "Rat-Free" Islands
- Unnecessary or Illegal Disturbance to Sensitive Species and Habitats
- Collection of Wildlife Parts for Personal Use
- Wildlife Exposure to Shoreline Treatment Chemicals

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

3630 - Vessel Grounding or Sinking Response

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

- 3630.1 – Preventing Rat Introduction to Alaska’s Rat-Free Islands
- 3630.2 – Entanglement and Fishing Gear
- 3630.3 – Disposal of On-Board Catch
- 3630.4 – Preventing Spread of Invasive Species Other than Rats
- 3630.5 – Preventing Impacts to Wildlife and Habitats during Vessel Removal, Salvage, or Scuttling

Pribilof Islands-specific information is included in Section [3630.1](#) and [3630.2](#) of this document. See sections 3630.3 through 3630.5 of the Alaska WPG for information on the other topics.

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

3630.1 - Preventing Rat Introduction to the Pribilof Islands

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

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

Table 3-1. Islands in the Alaska Maritime National Wildlife Refuge (NWR) known to have rats. All other islands in the Alaska Maritime NWR should be considered rat free.

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

All vessels operating in the vicinity of the Pribilofs should follow the *Rat Prevention Guidelines for Vessels* in Section [9740.3.6](#). Even with strict adherence to these guidelines, rats can access shorelines from grounded vessels or vessels sinking close to shore, and rats can drift to shore on vessel debris. Stricken vessels should be examined for evidence of rats by USFWS representatives (or their designees) if it is possible and safe to do so. If rats are known or suspected to be onboard the vessel, USFWS representatives or individuals on the Pribilofs certified to use rodent poisons should deploy rodent traps on the vessel and poisons in the vicinity of the vessel prior to or after the vessel grounding. A list of rat

prevention equipment and materials currently stockpiled on the Pribilofs is provided in [Table 3-2](#). Island Sentinels with the Aleut Community of St. Paul Ecosystem Conservation Office (ECO) maintain rodenticide applicator certifications and can assist when needed (see WILDLIFE CONTACTS section for contact information). ECO, in partnership with the Alaska Maritime National Wildlife Refuge, Conservation International, and the State of Alaska, has a Rat Prevention and Response Plan that may be used to assist with rodent eradication during an oil spill or vessel grounding emergency.

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

Response vessels or aircraft could also inadvertently transport rats to rat-free areas, so vessels and aircraft should be examined for evidence of rats before deployment. In addition to the *Rat Prevention Guidelines for Vessels* (Section [9740.3.6](#)), the USFWS and ADF&G can provide guidance and assistance in finding resources to examine boats and planes for rats.

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

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

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

3630.2 - Entanglement and Fishing Gear

General information about entanglements and fishing gear from vessel sinkings or groundings can be found in Section 3630.2 of the Alaska WPG. Section [3630.2.1](#), below, provides more detailed information about responding to marine debris associated with vessel groundings and sinkings, including fishing gear.

3630.2.1 - Marine Debris Response

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

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

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

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

3630.2.1.1 - Marine Debris Removal Priorities and Protocols

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

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

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

1. Retrieve marine debris that has detached from the vessel in nearby waters or shorelines.
 - Determine if any gear, especially fishing nets, is in the water and still attached to the vessel. Remove or secure.

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>

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

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

1. Initial Marine Debris Retrieval and Documentation

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

2. Monitor Debris and Wildlife

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

- a. Report Impacts

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

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

- b. Respond to Wildlife

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

3. Marine Debris Removal Throughout the Response

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

a. Establish a Marine Debris Baseline

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

b. Remove Debris from Shorelines and Surrounding Waters

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

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

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

c. Storage of Recovered Marine Debris

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

3640 - Wildlife Branch (WB)

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

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

To ensure these objectives are achieved with maximum efficiency, the WBD (in coordination with the EU) coordinates the activities of the federal, state, and local agencies along with wildlife response organizations that are under the authority of the Unified Command during spill response. Early development and implementation of a WRP ensures timely mobilization of dedicated staff, equipment,

and facilities. The wildlife response effort should be flexible and scalable to the size of the oil spill; only those positions necessary and appropriate for a specific incident are filled.

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

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

3640.1 - Wildlife Reconnaissance (Recon)

Wildlife Recon is typically initiated before any other wildlife protection strategies (Section [3640.2](#)) and is continued in concert with those strategies. The *Tactic: Wildlife Reconnaissance (Recon)* is available in Section [9740.3.2](#) and specific resources for wildlife recon in the Pribilofs are described in Section [3640.1.2](#).

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

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

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

Wildlife recon can be performed by any spill responder, especially in the first 24 to 48 hours (before dedicated wildlife responders usually arrive on scene). Wildlife Observers will be deployed based on spill conditions, location, and species likely to be present. Anyone can use the *Wildlife Observation Form* ([Figure 9-1](#)) to record and summarize observations. The *Alaska Spill Response Wildlife ID Aid*, available on the ARRT [Wildlife Protection Guidelines](#) webpage, is a field tool designed to aid responders in the general identification and documentation of wildlife observed in the early stages of a spill response.

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

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

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

Wildlife Observers (a specific position within the ICS and described in more detail below) will follow an incident-specific wildlife observation protocol (generally developed by the wildlife agencies). The *Tactic: Wildlife Reconnaissance (Recon)* (Section 9740.4.2) is a generic protocol that can be adapted for specific incidents. Incident-specific protocols should be scaled appropriately for the size and location of the incident and should include more detail on species most likely to be in the area and ESA-listed or other protected species. The skills and duties of Wildlife Observers differ from those of first responders conducting initial wildlife recon and all other responders. A Wildlife Observer’s sole duty is to observe, record, and report information on wildlife.

Wildlife Observers must:

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

3640.1.1 - Authorizations and Permits for Wildlife Recon

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

3640.1.2 - Resources for Wildlife Recon on the Pribilof Islands

There are several sources of information available to assist personnel conducting wildlife observations on the Pribilof Islands. Species lists for migratory birds and marine mammals can be found in Sections 9740.2.1 and 9740.2.2, respectively. The ECO Sentinel Program can provide specific information about the presence of species.

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

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

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

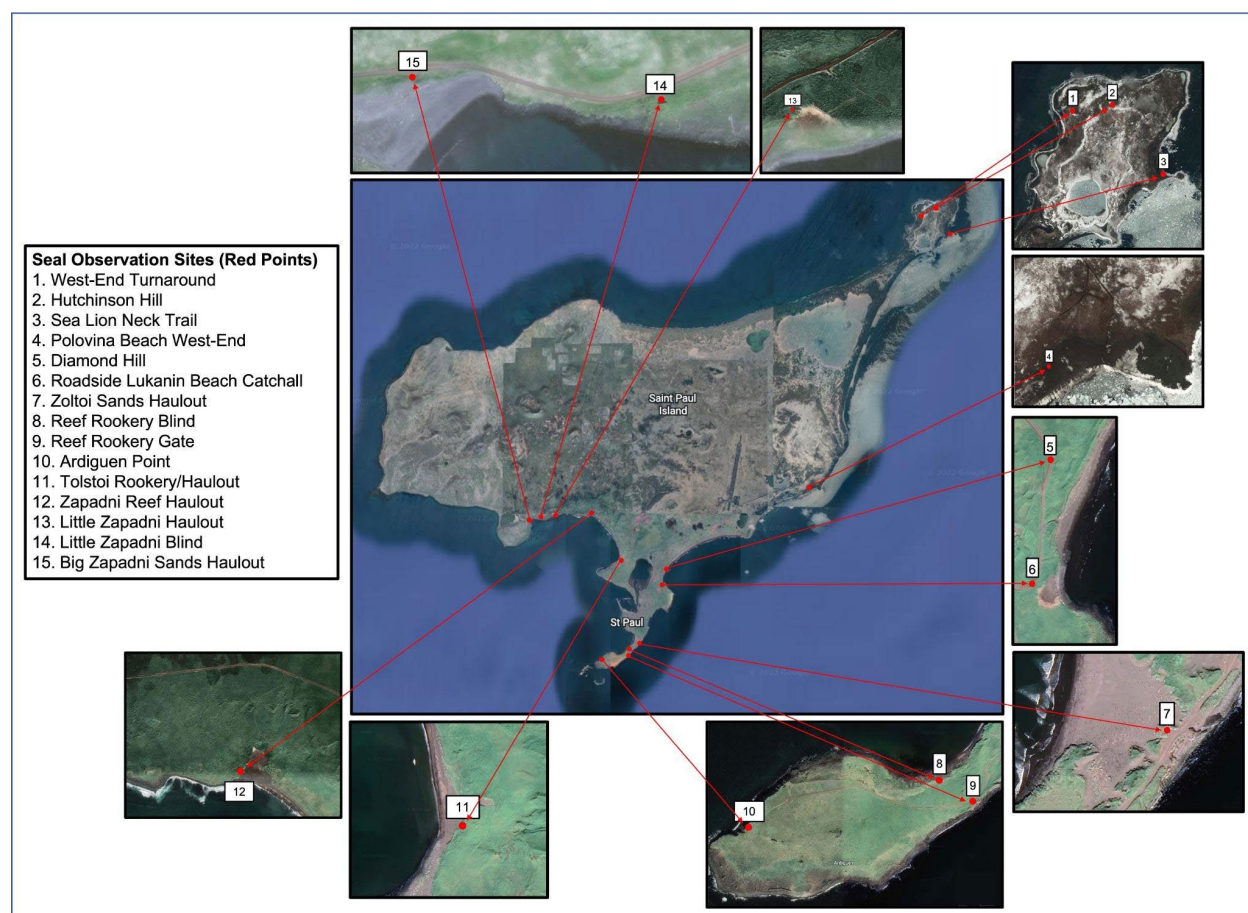


Figure 3-2. Land-based observation locations on Saint Paul Island. Red lines/dots indicate pre-existing observation points for northern fur seals.



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

3640.2 - Wildlife Response Strategies

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

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

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

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

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

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

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

The process for obtaining permits and authorizations is provided below in Section 3650. Species-specific information for primary, secondary, and tertiary wildlife response strategies is in Section 9740.2.

3650 - Request for Wildlife Response Activities

During an oil spill response when wildlife is or could become oiled, some or portions of the wildlife response strategies may need to be implemented before all the details necessary to carry out entire strategies are available. A two-phase process allows initial wildlife response strategy implementation as soon as possible using the Startup WRP (Section 9740.3.8.1) and allows additional details to be added in the Comprehensive WRP (Section 9740.3.8.2) as the spill response continues. This two-phase process allows time to:

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

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

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 has secured any required incident-specific authorizations (e.g., for carcass collection or anything that may affect ESA-listed species).

Table 3-4. Comparison of Startup and Comprehensive Wildlife Response Plans (WRPs) for Oil Spill Response in Alaska.

Startup WRP	Comprehensive WRP
Allows request and implementation of some strategies within the first 72 hours of an incident.	Allows longer-term response strategies to be developed and communicated to 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).

3650.1 - Startup Wildlife Response Plan (WRP)

The Startup WRP (Section [9740.3.8.1](#)) is a request to begin the process of authorizing and implementing all or some portion of wildlife response strategies to be conducted for up to 72 hours after the start of a spill. Wildlife response activities approved in the Startup WRP (including carcass collection, hazing/deterrence, or capture and rehabilitation) will not be authorized beyond 72 hours after the start of the spill (unless the same activities have been included in an approved Comprehensive WRP—see below). Upon approval by the wildlife agencies, the Startup WRP should be submitted to the OSCs for their approval and for inclusion in the next Incident Action Plan (IAP).

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

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

3650.2 - Comprehensive Wildlife Response Plan (WRP)

A Comprehensive WRP approved by the wildlife agencies is needed for activities conducted beyond 72 hours following the start of a spill. The Comprehensive WRP (Section [9740.3.8.2](#)) should be completed and approved by the wildlife agencies and the Unified Command before any carcass collection, hazing/deterrence, pre-emptive capture, or capture and rehabilitation activities begin or before the Startup WRP expires. The Comprehensive WRP can be amended if substantially new wildlife response activities are proposed.

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

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

3650.3 - Inadvertent Impacts of Wildlife Response Activities

Response activities, even those designed to assist wildlife, may result in inadvertent impacts to other species which should be anticipated and planned for. For example, authorized hazing or deterrence of seabirds conducted near a northern fur seal rookery could cause the fur seals to flush into the water, become oiled, or crush pups.

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

4000 - PLANNING

4600 - Environmental Unit (EU)

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

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

4610 - Planning Activities for Fish and Wildlife Protection

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

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

[4610.2 – General Wildlife Protection Considerations](#)

[4610.3 – Wildlife Standards of Response](#)

[4610.4 – Wildlife Response Strategies](#)

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

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

4610.1 - Resources at Risk (RAR) Summary

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

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

4610.2 - General Wildlife Protection Considerations

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

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

- The introduction of rats to rat-free islands (Section [4610.2.1](#)).
- Unnecessary or illegal disturbance to sensitive species and habitats, such as nesting raptors, seabird rookeries, and marine mammal haulouts and pupping areas (Section [4610.2.2](#)).
- Illegal collection of wildlife parts by response personnel (Section [4610.2.3](#)).
- Wildlife exposure to cleaning agents and bioremediation substances used for shoreline rehabilitation (Section [4610.2.4](#)).

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

4610.2.1 - Preventing Rat Introduction to Rat-Free Islands

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

Rats can access shorelines from grounded vessels or vessels sinking close to shore, and rats can drift to shore on vessel debris. In addition, response vessels or aircraft could inadvertently transport rats to rat-free areas. Response personnel can use the *Checklist: Vessel Grounding or Sinking Response* in Section [9740.3.5](#) as an aid to protect wildlife during vessel groundings and sinkings.

All vessels operating in the vicinity of the Pribilofs should follow the *Rat Prevention Guidelines for Vessels* in Section [9740.3.6](#). Stricken vessels should be examined for evidence of rats, if possible and safe to do so. Vessels associated with spill response activities should also be examined for rats. The USFWS and ADF&G can provide additional guidance and assistance in finding resources to examine boats and planes for rats.

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

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

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

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

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

4610.2.3 - Preventing the Collection of Wildlife Parts for Personal Use

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

4610.2.4 - Preventing Wildlife Exposure to Shoreline Treatment Chemicals

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

4610.3 - Wildlife Standards of Response

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

- Migratory birds and eagles
- Marine mammals under NMFS's jurisdiction in Alaska (Appendix [9740.5](#))
- Sea otters in Alaska

4610.4 - Wildlife Response Strategies

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

The following sections provide general information about:

[4610.4.1 - Primary Response Strategies](#)

[4610.4.2 - Secondary Response Strategies](#)

[4610.4.3 - Tertiary Response Strategies](#)

See Sections [9740.2.1.2](#) and [9740.2.2.2](#) for more detailed information about response strategies for migratory birds and marine mammals, respectively.

4610.4.1 - Primary Response Strategies

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

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

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

To request approval for the collection of carcasses, responders should fill out a Startup or Comprehensive WRP (Section [3650](#); Section [9740.3.8](#)) and submit it to the wildlife agencies.

4610.4.2 - Secondary Response Strategies

Secondary response strategies for protecting wildlife emphasize keeping wildlife away from oiled areas. These strategies include passive hazing and deterrence techniques, such as visual methods (e.g., floating or stationary human effigies, streamers, or helium-filled balloons) or physical barriers (e.g., fencing and netting), and active techniques, such as auditory deterrence (e.g., propane cannons and audio-visual alarms).

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

To request approval for wildlife hazing/deterrence, fill out a Startup or Comprehensive WRP (Section 3650; Section 9740.3.8) and submit to the wildlife agencies.

4610.4.3 - Tertiary Response Strategies

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

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

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

To request approval for any tertiary response activities, fill out a Startup or Comprehensive WRP (Section 3650; Section 9740.3.8) and submit to the wildlife agencies.

4800 - Required Correspondence, Permits & Consultation

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

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

4820 - Permits

Table 4-1. Summary of the fish and wildlife permits required for primary, secondary, and tertiary response activities (reproduced from the Alaska WPG, Section 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 Authorization ²
Haze/Deter	ADF&G Wildlife Response Permit	USFWS MMPA Authorization	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. ¹An 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. ²For species managed by USFWS (i.e., migratory birds, sea otters, walruses, and polar bears). ³Request verbal case-by-case authorization from NMFS Regional Stranding Program Coordinator or associated co-investigator. ⁴ESA section 7 consultation between federal action agencies (i.e., USCG or EPA) and consulting agencies (USFWS and NMFS).							

9000 - APPENDICES

9700 - Environmental, Fish & Wildlife Protection Plans

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

9740.1 - Pribilof Islands Wildlife Protection Guidelines History & Revision Process

9740.2 - Species Information

9740.2.1 - Migratory Birds

9740.2.2 - Marine Mammals

9740.3 - Wildlife Response Tactics, Guidelines, and Forms

9740.3.1 - Wildlife Response Best Management Practices (BMPs)

9740.3.2 - Tactic: Wildlife Reconnaissance (Recon)

9740.3.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses

9740.3.4 - Wildlife Capture Forms

9740.3.5 - Checklist: Vessel Grounding or Sinking Response

9740.3.6 - Rat Prevention Guidelines for Vessels

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

9740.3.8 - Wildlife Response Plans (WRPs)

9740.4 - Local Contact Signs

9740.5 - NMFS Marine Mammal Emergency Response Standards

9740.1 - Pribilof Islands Wildlife Protection Guidelines History & Revision Process

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

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

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
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	April 2023

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

9740.2 - Species Information

9740.2.1 - Migratory Birds

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

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

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

9740.2.1.1 - Migratory Bird Protection Priorities

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

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

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

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

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

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
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

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

Species	Species Group	Occurrence	Status
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	-
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)			

9740.2.1.2 - Migratory Bird Response Strategies

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

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

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

- Degree of oiling and length of exposure.
- Health of the birds prior to exposure.

- Toxicity of the product spilled.
- Distribution of the spilled product in the environment.

9740.2.1.2.1 - Primary Response

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

Oiled debris and oiled wildlife carcasses should be removed from the environment as soon as possible to prevent secondary contamination of scavengers, including raptors. Secondary contamination can occur through 1) ingestion of oily carcasses, and 2) physical contact with oil on carcasses or other oiled debris. See Section 3640.2 and the *Tactic: Collection of Small Carcasses and Documentation of Large Carcasses* (Section 9740.3.3) for additional information on carcass collection.

9740.2.1.2.2 - Secondary Response

Secondary response strategies emphasize keeping birds away from oiled areas by deterrence, moving birds from oiled areas using hazing, and pre-emptive capture, holding, and release of unoiled birds. Sections 9740.2.1.2.2.1 and 9740.2.1.2.2.3 provide additional information about deterrence activities and pre-emptive capture of birds, respectively.

9740.2.1.2.2.1 - Deterrence Activities

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

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

Bird deterrence includes passive and active hazing methods, as well as the use of physical barriers to separate wildlife from spilled oil. Table 9-4 shows the different methods and considerations for the use of each type. The examples provided include some of the most common methods, but this is not an exhaustive list.

Table 9-4. Bird deterrence and hazing methods, examples, and considerations.

Type	Method	Examples	Considerations
Passive hazing	Devices using wind-generated movement to create visual disturbances.	Human effigies Predator models Flags Balloons Reflective tape	Can be deployed and left unattended for short periods of time. Should be checked at least once per day and during and after high wind or wave events.
Active hazing	Noise-generating devices.	Gas-operated exploders, pyrotechnics, electronic sound generators Boats, aircraft, all-terrain vehicles	Requires periodic or continuous on-site attendance, depending on method used.
Physical barriers	Structures to minimize or prevent contact with oil.	Netting Fencing	May require periodic checks. May be effective for terrestrial incidents affecting wetlands and oil storage pits.

Only individuals trained and certified in bird deterrence techniques by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service within the last three years will be authorized to conduct migratory bird deterrence activities. [Table 9-5](#) shows the Pribilof Island residents that completed the training in 2021. Additional individuals may be approved by ADF&G on a case-by case basis based on a thorough review of training protocols, training records, individual and organization experience, and incident details. This information must be included in the Startup or Comprehensive WRP (Section 9740.3.8 of the Alaska WPG) and approved by all wildlife agencies. Oversight for migratory bird deterrence activities will be conducted by ADF&G and USFWS.

A list of migratory bird deterrence equipment and materials stockpiled in the Pribilofs is provided in [Table 9-6](#).

Table 9-5. 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

Table 9-6. Equipment and materials stockpiled in the Pribilof Islands for deterring unoiled 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

9740.2.1.2.2.2 - Bird Deterrence Forms and Tools

- Request authorization to conduct bird deterrence in Startup or Comprehensive WRPs (Section [3650](#); Section [9740.3.8](#)).
- 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.

9740.2.1.2.2.3 - Pre-emptive Capture

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

Pre-emptive capture of birds requires personnel trained in bird capture, handling, transportation, and release techniques. The pre-emptive capture of birds on the Pribilofs is generally not feasible; however,

decisions to conduct pre-emptive capture will be assessed on a case-by-case basis and will depend on the availability of trained personnel, equipment, facilities, type of product spilled, and other incident-specific variables. In cases where trained personnel and facilities are not available to pre-emptively capture birds, observers will monitor the birds for signs of oiling.

9740.2.1.2.3 - Tertiary Response

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

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

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

- Shelter
- Ventilation
- Waste management

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

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

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

9740.2.1.2.3.1 - Oiled Bird Capture, Stabilization, and Rehabilitation Forms and Tools

- Request authorization to conduct oiled bird capture in Startup or Comprehensive WRPs (Section [3650](#); Section [9740.3.8](#)).
- Permits required for conducting capture are listed in [Table 4-1](#).

- Any capture of ESA-listed birds will be addressed via a 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.
- Rehabilitated oiled birds of species that may be harvested for subsistence purposes will have an “OILED-TREATED” leg band placed on them prior to release.

9740.2.2 - Marine Mammals

General Considerations

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

9740.2.2.1 - Marine Mammal Protection Priorities

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

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

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

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

Table 9-7. Occurrence and status of marine mammals 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	U	S	-
Ribbon seal	O	-	-
Ringed seal	U	S, TS	7
Northern elephant seal	O	-	1
Minke whale	P	-	1
Fin whale	P	ES	3
Gray whale	P	ES	2
Humpback whale	U	TS, ES	-
Sei whale	R	ES	-
North Pacific right whale	R	ES, SES	-
Blue whale	R	ES, SES	-
Baird's beaked whale	O	-	1
Sato's beaked whale	O	-	1
Cuvier's beaked whale	O	-	-
Stejneger's beaked whale	O	-	-
Beluga whale	U	S	3
Killer whale	P	-	3
Sperm whale	U	ES	1
Harbor porpoise	P	-	3
Dall's porpoise	U	-	-

¹USFWS manages sea otters and walruses; other marine mammals in this table are managed by NMFS. Multiple distinct population segments of gray whale and humpback whale with different statuses occur near the Pribilof Islands.

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

9740.2.2.2 - Marine Mammal Response Strategies

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

9740.2.2.2.1 - NMFS Alaska Region Marine Mammal Stranding Network

All disaster response activities involving NMFS trust species must first be authorized under the MMPA/ESA permit issued to the NMFS Marine Mammal Health and Stranding Response Program (MMHSRP). MMHSRP has *Pinniped and Cetacean Oil Spill Response Guidelines* to direct and inform response activities for pinnipeds and cetaceans – guidelines that align with response actions being taken

for other wildlife species at risk. The Alaska Regional Stranding Coordinator serves as a co-investigator on this permit, and as such, can authorize marine mammal disaster response activities in collaboration with NMFS MMHSRP. NMFS expects that trained members of the stranding network, and/or their designees, would be granted authorization to carry out many of the marine mammal-related roles in the Wildlife Branch under the Unified Command.

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

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

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

Additional details available in:

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

9740.2.2.3 - Marine Mammal Information by Species

9740.2.2.3.1 - Sea Otters

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

Sea otters are extremely vulnerable to oil spills, regardless of age, because of their small size, dependence on fur rather than blubber for insulation, and heavy use of near-shore habitats. The sea otters in the Pribilofs are part of the southwest Alaska distinct population segment (DPS) of northern sea otters; this DPS was listed as threatened under the ESA in 2005 (70 FR 46365; August 9, 2005). All sea otters in Alaska are also protected under the MMPA.

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

9740.2.2.3.1.1 - Response Strategies for Sea Otters

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

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

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

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

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

Primary response strategies may also include sea otter carcass collection.

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

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

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

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

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

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

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

9740.2.2.3.1.2 - Sea Otter Response Forms and Tools

Sea Otter Primary Response Strategies Forms and Tools:

- Request authorization to conduct sea otter carcass collection in Startup or Comprehensive WRPs (Section [9740.3.8](#)).
- Permits required for conducting primary response activities that may affect otters are shown in [Table 4-1](#).

Sea Otter Secondary Response Strategies Forms and Tools:

- Request authorization to conduct sea otter deterrence and pre-emptive capture and holding in Comprehensive WRPs (Section [9740.3.8.2](#)).
- Permits required for conducting sea otter deterrence or pre-emptive capture and holding are listed in [Table 4-1](#).
- Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) webpage.

Sea Otter Tertiary Response Strategies Forms and Tools:

- Request authorization to conduct oiled sea otter capture, transport, stabilization, rehabilitation, release, or relocation in Startup or Comprehensive WRPs (Section [9740.3.8](#)).

- Permits required for conducting oiled sea otter capture and related activities are listed in [Table 4-1](#).
- Procedures and protocols in *Emergency Care and Rehabilitation of Oiled Sea Otters*, available on the ADEC [Area Plan References and Tools](#) webpage.

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

9740.2.2.3.2 - Pinnipeds

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

9740.2.2.3.2.1 - Northern Fur Seals

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

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

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

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

islands and the Salt Lagoon on Saint Paul Island may contain up to 1,000 northern fur seal pups and 50 male juvenile northern fur seals from September through November.

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

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

Potential Oil Spill Impacts

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

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

Disturbance to northern fur seals may result from the presence of oil spill response workers and associated aircraft, vessel, and ground support vehicles. Northern fur seals may respond to human presence by immediate departure from the area. Prolonged or intense disturbance could result in abandonment of the site. Disturbance during the breeding season could result in increased mortality of fur seal pups due to disrupted nursing or crushing due to stampedes of frightened animals.

From 1995 to 2021, 120 oil spills were reported on or near the Pribilofs (41 of which were vessel-based spills) according to the Alaska Department of Environmental Conservation database (ADEC Spills Database). The 120 spills include petroleum and non-petroleum (synthetic) oil spills. The largest spill in

the Pribilofs during this time period occurred in 2017 when a fishing vessel sank near St. George Island. The capsized vessel released 35,456 gallons of diesel into the marine environment, none of which was recovered (ADEC Spills Database). During the same time period (1995-2021), 1,079 spills were reported in the eastern Aleutian Islands, 499 of which were vessel-based (ADEC Spills Database). Due to the subjective nature of the reporting of the location of spills and the nearby rookeries on Bogoslof Island, spills in the eastern Aleutians are important to consider for possible impacts to northern fur seals. The three largest of the eastern Aleutian Island spills from 1995 to 2021 were 39,000 gallons in November 1997, 321,052 gallons in December 2004, and 145,000 gallons in March 2008. If these spills had occurred during spring or fall during fur seal migration, they could have significantly impacted fur seals migrating through Aleutian Islands passes. In the event that an oil spill approaches or contacts a rookery, cleanup efforts may be directed to both nearshore and offshore regions.

9740.2.2.3.2.2 - Steller sea lions

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

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

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

Potential Oil Spill Impacts

Spills (depending on many variables such as amount and type of product spilled) can affect the health, survival, and reproduction of exposed Steller sea lions. Steller sea lions can also be impacted by response activities, such as helicopter and vessel activity. Steller sea lions are highly susceptible to disturbance when on haulouts and rookeries. The marked sexual dimorphism in size within the species and the large size of adults, especially adult males, are both features of Steller sea lion morphology that are important to consider when evaluating their vulnerability to disturbance when the animals are hauled out on land. Smaller animals are vulnerable to injury and death if trampled by adults, especially by large males. The large size of Steller sea lion adults also makes the capture, handling, and salvage of this species more challenging than many other pinnipeds. Capture of subadult and adult Steller sea lions is typically conducted by an experienced team using remote sedation.

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

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

9740.2.2.3.2.3 - Harbor seals

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

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

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

9740.2.2.3.2.4 - Response Strategies for Pinnipeds

9740.2.2.3.2.5 - Primary Response Strategies

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

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

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

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

Information on aircraft advisories for St. George and Saint Paul islands may be found on the FAA [Flight Advisories for Wildlife Sensitive Areas](#) webpage. See Section 3610 for additional details regarding access prohibitions to protect birds, northern fur seals, and other wildlife species on the Pribilofs.

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

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

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

Table 9-8. Materials stockpiled on the Pribilof Islands for pinniped protection.

Location	Amount of Supplies	Owner	Contact Information
Saint Paul Island In 20-foot connexes on the concrete pad south of the GARCO Warehouse	1,400 30-pound bags of Sphag Sorb™	National Marine Fisheries Service	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
Saint Paul Island Inside the GARCO Warehouse above the south side entry door	9 yellow plastic 95-gallon overpack salvage drums each containing 1 to 3 25-foot sections of lightweight oil recovery boom	National Marine Fisheries Service	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

9740.2.2.3.2.6 - Secondary Response Strategies

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

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

A NMFS proposed rule (85 FR 53763) to deter marine mammals provides a proposed list of guidelines to safely deter marine mammals and specific measures which may be used to nonlethally deter marine mammals listed under the ESA. These guidelines are intended to deter marine mammals from damaging fishing gear and catch, damaging personal or public property, or endangering personal safety, and may provide useful information during an oil spill response. In addition, NMFS and ECO have personnel who are familiar with deterring or moving northern fur seals because it is a tactic they use during research and disentanglement activities.

9740.2.2.3.2.7 - Tertiary Response Strategies

Capturing and cleaning oiled adult pinnipeds may not be feasible due to concerns for both the safety of the animals and the human responder. See [Cetacean and Pinniped Transport Best Practices](#) (Appendix X) in the Appendices of the *Final Programmatic Environmental Impact Statement for the Marine Mammal*

Health and Stranding Response Program (2022). Unless the probability of survival for an oiled animal is considered very low, and the likelihood of successful rehabilitation is very high, tertiary response strategies will not be used. Capture and rehabilitation of adult pinnipeds could require administering sedatives or other drugs in the field. Pups and juveniles can be small enough to capture and rehabilitate. However, many logistical requirements for the treatment of pinnipeds, such as a large, heated building, holding pens for large animals, and high-capacity hot water systems, cannot be met at this time on the Pribilofs. Euthanasia under the supervision of a veterinarian or as authorized by NOAA Regional Stranding Coordinator or others authorized under the MMHSRP permit should be followed to alleviate suffering for individual animals with no chance of survival. Also, see [Marine Mammal Euthanasia Best Practices](#) (Appendix XIII) of the *Final Programmatic Environmental Impact Statement for the Marine Mammal Health and Stranding Response Program* (2022).

9740.2.2.3.2.8 - Pinniped Response Forms and Tools

- Request authorization to conduct pinniped response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs (Section [9740.3.8](#)).
- Permits required for conducting pinniped deterrence or pre-emptive capture are listed in [Table 4-1](#).

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

9740.2.2.3.3 - Cetaceans

There are numerous cetacean species found in the waters surrounding the Pribilof Islands including killer whales, Dall's porpoise, harbor porpoise, sperm whale, humpback whale, fin whale, minke whale, and North Pacific right whale. Some of these species have also stranded on the shores of the Pribilof Islands ([Table 9-7](#)).

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

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

- Request authorization to conduct cetacean response activities (hazing/deterrence, pre-emptive capture and related activities, or oiled animal capture and related activities) in Startup or Comprehensive WRPs (Section [9740.3.8](#)).
- Permits required for conducting cetacean response activities are listed in [Table 4-1](#).
- Deterrence techniques have been developed for killer whales in Washington State and may be appropriate for killer whales or other cetacean species in Alaska:

- Supporting Information for the Killer Whale section of the Northwest Wildlife Response Plan, Chapter 9970 of the Northwest Area Contingency Plan, available from the NOAA Office of Response and Restoration [Oil Spill Response and Killer Whales](#) webpage.
- Norris, Kenneth S., and Roger L. Gentry. 1974. Capture and Harnessing of Young California Gray Whales, *Eschrichtius robustus*. Marine Fisheries Review 36(4):58-64.
- Mate, Bruce R. and James T. Harvey, eds. 1987. Acoustical Deterrence in Marine Mammal Conflicts with Fisheries. Proceedings of a February 17-18, 1986, Workshop in Newport, Oregon. Oregon State University Sea Grant College Program, Corvallis, Oregon.
- Appendices for the 1) *NMFS Arctic Marine Mammal Disaster Response Guidelines* and 2) *NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines*, available from the [NOAA Institutional Repository](#).

If primary, secondary, or tertiary response strategies are proposed where cetaceans are present or may be present, the OSCs will need to immediately consult with NMFS regarding the proposed strategies to ensure compliance with the MMPA and ESA (see [Section 4800](#)).

9740.3 - Wildlife Response Tactics, Guidelines, and Forms

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

9740.3.1 - Wildlife Response Best Management Practices (BMPs)

9740.3.2 - Tactic: Wildlife Reconnaissance (Recon)

9740.3.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses

9740.3.4 - Wildlife Capture Forms

9740.3.5 - Checklist: Vessel Grounding or Sinking Response

9740.3.6 - Rat Prevention Guidelines for Vessels

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

9740.3.8 - Wildlife Response Plans (WRPs)

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

9740.3.1 - Wildlife Response Best Management Practices (BMPs)⁷

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

For All Response Activities

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

For Land-Based Activities

6. Avoid disturbing vegetation and shorelines with foot traffic, boats, and equipment. Consult wildlife agency representatives in the Wildlife Branch or Environmental Unit if disturbance cannot be avoided.
7. Use existing access and egress areas and roadways.
8. Use low-pressure tire vehicles (e.g., all-terrain vehicles or side-by-side) or consult with wildlife agency representatives in the Wildlife Branch or Environmental Unit to minimize impact.
9. Minimize removal of clean (unoled) sediments.
10. Staging areas and waste collection areas should be examined, and land management agencies (e.g., Alaska Department of Natural Resources) consulted for the presence of historic properties, cultural resources, and biological resources prior to establishment. Support infrastructure should be located away from sensitive habitats, including shorelines, scrub, riparian habitat, and other vegetated areas. In addition, ADNR Division of Mining, Land and Water (DMLW) manages some intertidal and submerged lands on the Pribilofs—permits may be needed for some activities.
11. All heavy equipment use should be as low on the beach as possible and avoid the high tide or wrack line while conducting cleanup activities. Keep heavy equipment away from the wrack line unless the wrack line is oiled. Contact ADNR DMLW for permits to operate heavy equipment on ADNR-managed land.

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

12. Activities that require removal of riparian, forested, scrub, shrub, or other vegetated habitat should be minimized.
13. Waste management should be conducted in a manner that minimizes attracting wildlife (e.g., removing trash daily from work sites). If possible, cut all materials that form closed loops (e.g., plastic packing bands, rubber bands, and all other loops) prior to proper disposal in a closed and secured trash bin.
14. Stakes or flagging that preceded the spill and response activities should not be removed or destroyed.

For Aircraft Activities

15. Adhere to incident-specific flight restrictions over sensitive habitats and avoid hovering or landing aircrafts in these areas.
16. Adhere to flight altitude restrictions over wildlife management areas and other managed lands.

For On-water Activities

17. If marine mammals or birds become trapped or entangled in boom, anchor lines, or other response equipment, notify wildlife agency representatives for instructions.
18. Install and monitor underwater equipment or booms to prevent entrapment of fish and wildlife.
19. Do not block major egress points in channels, rivers, passes, and bays.
20. Use a properly screened water intake to avoid impacts to fish, especially juvenile or small resident fish. The intake should be centered with a screened enclosure to reduce the potential for fish to be entrained, impinged, or injured. Contact ADF&G for recommendations on screen mesh sizes and minimum water velocity depending on the location and timing of water withdrawal activities.

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

9740.3.2 - *Tactic: Wildlife Reconnaissance (Recon)*

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

Tactic: Wildlife Reconnaissance (Recon)

Objective and Strategy

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

Tactic Description

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

Safety Considerations

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

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

Operational Considerations

Operating Environments, Geographic Considerations, and Access

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

Species Type and Life Stage

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

Communications

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

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

Table 9-9. 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.

Implementation

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

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

Wildlife Observers

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

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

2. Field Implementation:
 - a. Conduct surveys, record on map the area travelled and surveyed, take photographs.
 - b. Follow instructions on back of Wildlife Observation Form while filling them out and ensure documentation is complete and accurate at the end of each shift.
 - c. For long-term events, establish a routine and consistent survey schedule.
3. Deliverables (end-of-shift):
 - a. Completed Wildlife Observation Form(s) for each area surveyed.
 - b. Map of areas travelled and surveyed.
 - c. Any other documentation required by incident-specific protocols and formats.

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

Related Tactics

- Collection of Small Carcasses and Documentation of Large Carcasses (Section [9740.3.3](#))

Resources

- *Alaska Spill Response Wildlife ID Aid*, available on the ARRT Wildlife Protection webpage: this is a field tool designed to aid spill responders in the general identification and documentation of wildlife observed in the early stages of a spill.

Forms (on following pages)

- [Figure 9-1: Wildlife Observation Form](#)
 - A printable version of this form is available on the on the ADEC [Area Plan References and Tools](#) webpage.

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

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) ☐ : NAD83 ☐ : NAD27 ☐ : Other: _____		Camera & SD Card ID #: _____ GPS & SD Card ID #: _____	
For surveys, GPS Trackline File Name: _____ Total distance surveyed: _____ mi ☐ or km ☐					
OBSERVATION INFORMATION					
Platform: On foot ☐ Truck/4-wheeler ☐ Vessel ☐ Aircraft ☐ Other ☐		Platform Description:			
Cloud Cover (%) _____	Wind Speed _____ mph ☐ knots ☐ OR Beaufort Wind Scale (1-6): _____			Direction wind is blowing from: _____	
Precipitation: None ☐ Fog/Mist ☐ Light Rain ☐ Heavy Rain ☐ Snow ☐				Visibility: Excellent ☐ Good ☐ Fair ☐ Poor ☐	
Time	Latitude (decimal degrees)	Longitude (decimal degrees)	Species/ Species Group	ID Certainty	# of Animals
EXAMPLE 0805	57.70818 N	-52.32819 W	seabirds	certain	18

Wildlife Observation Form – WPG Version 2020.1 (front page)

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

Pribilof Islands WPG
9000 – Appendices

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9740.3.3 - Tactic: Collection of Small Carcasses and Documentation of Large Carcasses

A grab-and-go version of this tactic begins on the following page. A standalone version of the tactic and full-page versions of the associated forms and job aid are available on the ADEC [Area Plan References and Tools](#) webpage. Check this website for the most recent version.

In addition, the training video for this tactic, can be found on the [ARRT Wildlife Protection Guidelines](#) webpage.

Tactic: Collection of Small Carcasses and Documentation of Large Carcasses

Objective and Strategy

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

Tactic Description

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

Safety Considerations

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

Operational Considerations

Operating Environments, Geographic Considerations, and Access

- Carcass collection may be performed in all environments where a spill can occur, including:
 - On land;
 - Lakes, streams, and rivers and associated shorelines;
 - Marine shorelines, marine nearshore, and open water.
- Responders may search for carcasses on foot or by vehicle (snow machine, truck, ATV, boat, aircraft) depending on the size, location, and complexity of the spill; terrain; and land ownership/access.

- While carcass collection and disposition procedures will follow this tactic, how those carcasses are found – carcass surveys – may vary depending on the size, location, and complexity of the spill; survey protocols may be incident-specific.

Species Type and Life Stage

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

Communications

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

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

- See [Table 9-11](#) on next page.

Table 9-10. 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.

Notes:

Implementation

1. Preparation:
 - a. Obtain PPE, equipment, and printed copy of Permits and Authorizations.
 - b. Ensure activities can be safely conducted.
 - c. Determine if Bear Guards or bear safety equipment are needed for shoreline or inland activities in accordance with the incident-specific Safety Plan.
2. Field Implementation (see also [Figure 9-2: Carcass Collection Job Aid For Small Carcasses](#))
 - a. RECORDER: Complete top of Carcass Collection Form, following instructions on back of form.
 - i. Fill out the shoreline search section of the form only if instructed to do so, using incident-specific protocols.
 - ii. Take photos as needed to document carcasses in the field.
 - b. COLLECTOR: Wearing new nitrile gloves, place individual carcass in paper bag, then in clear plastic bag. For larger carcasses, wrap in uncoated (e.g., kraft) paper or aluminum foil and then place in larger plastic bags.
 - i. Do NOT put carcasses directly in plastic bags.
 - ii. Do NOT place nitrile gloves in bag with carcasses.
 - c. RECORDER: Complete a yellow Individual Carcass Identification Tag for each carcass.
 - i. The Carcass Chain of Custody (CoC) Tag # is the Batch Tag No. on the Carcass Chain of Custody (CoC) Tag:

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

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

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

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

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

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

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

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

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

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

3. Transport and Storage

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

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

Notes:

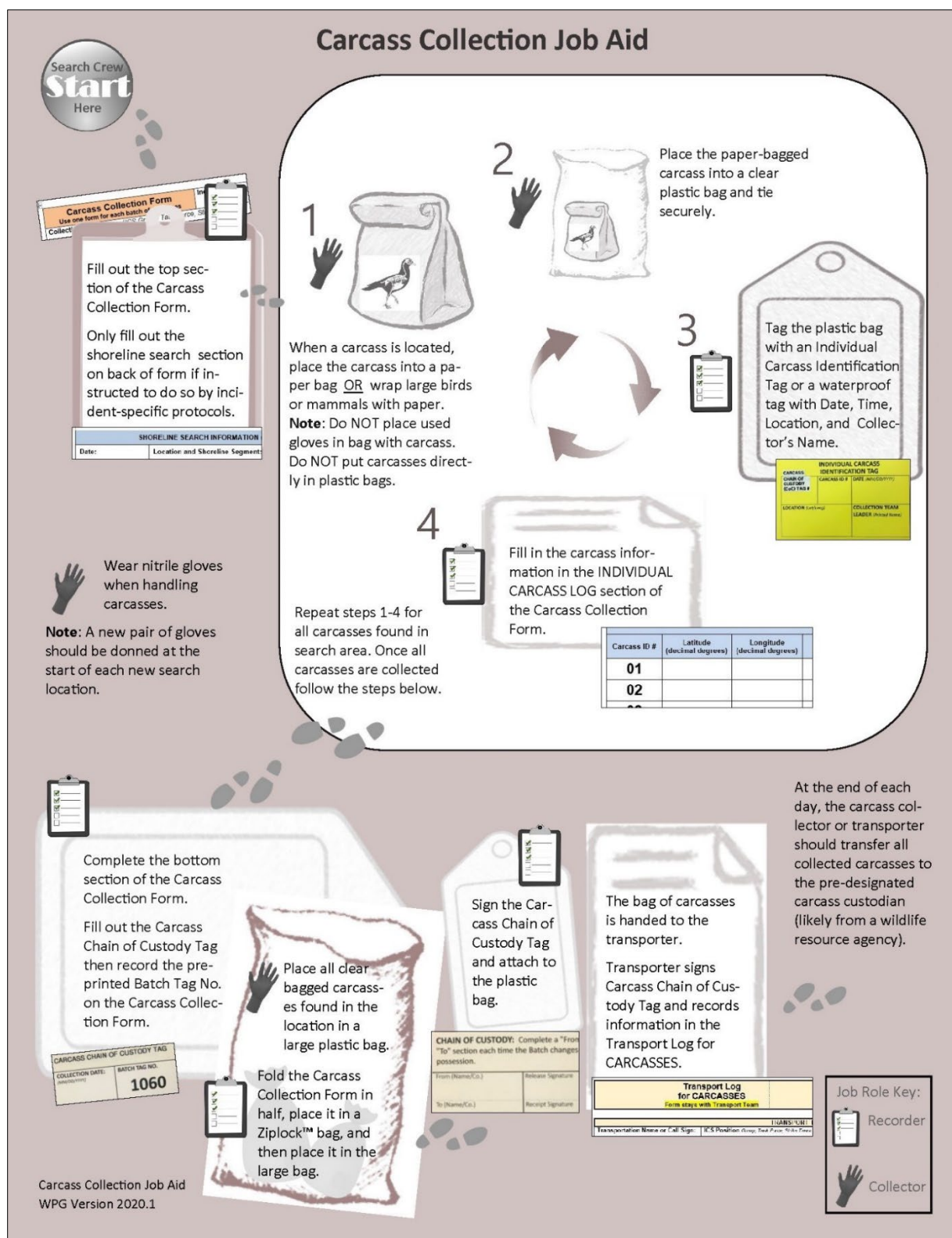


Figure 9-2. Carcass Collection Job Aid for Small Carcasses (full-page version available on the ADEC [Area Plan References and Tools](#) webpage).

Additional Resources for Small and Large Carcass Response

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

Related Tactics

- Wildlife Reconnaissance (Recon)

References

- National Marine Fisheries Service. 2017. NMFS Arctic Marine Mammal Disaster Response Guidelines. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/AKR-16. 81 p. + appendices. Available from the [NOAA Institutional Repository](#).
- National Marine Fisheries Service. 2019. NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines. NOAA Tech. Memo. NMFS-F/AKR-22. 80 p. + appendices. Available from the [NOAA Institutional Repository](#).
- Ziccardi, M.H., S.M. Wilkin, T.K. Rowles, and S. Johnson. 2015. Pinniped and Cetacean Oil Spill Response Guidelines. U.S. Dept. of Commerce, NOAA. NOAA Tech. Memo. NMFS-OPR-52, 138 p. Available from the [NOAA Institutional Repository](#).

Forms (on following pages)

- [Figure 9-3](#): Carcass Collection Form
 - A printable version of this form is available on the on the ADEC [Area Plan References and Tools](#) webpage.
 - Print landscape orientation on both sides of one sheet of water-resistant paper.
- [Figure 9-4](#): Individual Carcass Identification Tag
 - Pre-printed, as pictured, or use a water-resistant blank tag, two sides.
- [Figure 9-5](#): Carcass Chain of Custody (CoC) Tag
 - Pre-printed or use a water-resistant blank tag, two sides.
- [Figure 9-6](#): Carcass Intermediate Transporter’s Log
 - A printable version of this form is available on the on the ADEC [Area Plan References and Tools](#) webpage.
 - Print landscape orientation on both sides of one sheet of water-resistant paper

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 ☐ If not, Do Not Collect Carcasses			
Camera & SD Card ID #:		GPS & SD Card ID #:		GPS Datum: (WGS84 preferred) ☐ NAD83 ☐ NAD27 ☐ Other: _____			
General Location or Shoreline Segment:				<i>If applicable, fill out Shoreline Search Information on reverse.</i>			
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)							

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

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 ☐ Land ☐ Along Beach ☐ No wind ☐		Search Platform: Walking ☐ Boat ☐ Vehicle ☐ Aircraft ☐ Other ☐
Dominant Shoreline Type: Sand ☐ Pebble ☐ Cobble ☐ Boulder ☐ Bedrock ☐ Vertical Cliff ☐ Marsh ☐ Sand/Mud Flat ☐ Other ☐		
Beach Width Searched (feet): _____ Search Path: Single Path ☐ Out-and-back ☐		
Comments:		
Carcass Collection Form – WPG Version 2020.1 (back page)		

INDIVIDUAL CARCASS IDENTIFICATION TAG

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

TAG INSTRUCTIONS

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

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

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

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

Page _____ of _____

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

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

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

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

Figure 9-6 continued

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

INSTRUCTIONS: Transport Log for CARCASSES

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

Incident Name: Incident-specific assigned number or incident assigned name.		
TRANSPORT TEAM INFORMATION		
Transportation Name or Call Sign: Record boat/vehicle/aircraft name or identifying number. Transport Type: Check appropriate box.	ICS Position: ICS position of the transport boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1).	Data Recorder: Record information for the person filling out this form.
LOG INFORMATION		
Batch Tag Number: Pre-printed number on the Carcass Chain of Custody Tag.	Species: Find this information on the Carcass Collection Form or ask the Carcass Collection Team.	
Transporter Received the Carcass(es) 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		

9740.3.4 - Wildlife Capture Forms

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

- [Figure 9-7: Live Animal Capture Form](#)
 - Print landscape orientation on both sides of one sheet of water-resistant paper.
- [Figure 9-8: Capture Log for Live Animals](#)
 - Print landscape orientation on both sides of one sheet of water-resistant paper.
- [Figure 9-9: Transport Log for Live Animals](#)
 - Print landscape orientation on both sides of one sheet of water-resistant paper. These forms are provided for personnel who have been trained in live animal capture and transport.

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

LIVE Animal Capture Form Form stays with Animal		Species Captured? BIRD ☐ SEA OTTER ☐ OTHER ☐ : _____		Incident Name: _____	INV (OLE Use Only): _____
				Animal Number: _____	Rehab Facility Use Only

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

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

ANIMAL DESCRIPTION		
Age: ADULT ☐ PUP/CHICK ☐ MOM & PUP/CHICK ☐	Sex: MALE ☐ FEMALE ☐ UNK ☐	Disposition AFTER Capture: TRANSFERRED ☐ DIED ☐ ESCAPED ☐ EUTHANIZED ☐ ; RELEASED ☐ If released or euthanized explain in notes below.
Animal Behavior AFTER Capture: STILL/LETHARGIC ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; OTHER ☐ 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 ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; DEAD ☐ ; EUTHANIZED ☐ ; OTHER ☐ Explain: _____	
Transfer to: BOAT ☐ HELO ☐ VEHICLE ☐ STABILIZATION ☐ REHAB ☐ MORGUE ☐		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 ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; DEAD ☐ ; EUTHANIZED ☐ ; OTHER ☐ Explain: _____	
Transfer to: BOAT ☐ HELO ☐ VEHICLE ☐ STABILIZATION ☐ REHAB ☐ MORGUE ☐		Transferor's Printed Name: _____	Signature: _____
Receiver's Printed Name: _____		Signature: _____	Affiliation: _____

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

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

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 ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; DEAD ☐ ; EUTHANIZED ☐ ; OTHER ☐ Explain: _____	
Transfer to: BOAT ☐ HELO ☐ VEHICLE ☐ STABILIZATION ☐ REHAB ☐ MORGUE ☐		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 ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; DEAD ☐ ; EUTHANIZED ☐ ; OTHER ☐ Explain: _____	
Transfer to: BOAT ☐ HELO ☐ VEHICLE ☐ STABILIZATION ☐ REHAB ☐ MORGUE ☐		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 ☐ ; ALERT/ACTIVE ☐ ; AGGRESSIVE ☐ ; GROOMING/PREENING ☐ ; DEAD ☐ ; EUTHANIZED ☐ ; OTHER ☐ Explain: _____	
Transfer to: BOAT ☐ HELO ☐ VEHICLE ☐ STABILIZATION ☐ REHAB ☐ MORGUE ☐		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.	
Animal Location Prior to Capture: Check one.		Animal Behavior Prior to Capture: Check one or more as appropriate. If OTHER, explain.	
Capture Method: Check one. If OTHER, explain.	Reason for Capture: Check one. If oiled, estimate percentage of external oiling. If OTHER, explain (i.e., if injured, describe the injury).		Pursuit Duration: Amount of time (in minutes) from beginning of stalk until the animal is safely in a pet carrier.
Animal Reference Number: Sequential number assigned by the capture boat/vehicle/aircraft to each animal. Typically, the first three letters of the boat/vehicle/vessel name followed by sequential numbers (Ex: KIT 001, KIT 002, etc.)			Notes/ Explain Sections: Add information as deemed necessary and appropriate.
ANIMAL DESCRIPTION			
Age and Sex: Record, if known.		Disposition After Capture: Check as appropriate. If the animal was released, explain why in the notes section.	
Animal Behavior After Capture: Check one or more as appropriate. If OTHER, explain.		Animal Care Provided in Field: Briefly describe any care or treatment administered in the field or during transit.	
Notes/ Explain Sections: Add information as deemed necessary and appropriate.			
ANIMAL TRANSFER – FIELD CHAIN OF CUSTODY			
Date: Date of Transfer	Time: Time of Transfer Circle AM or PM.	Animal Behavior at Time of Transfer: Check one or more as appropriate. If OTHER, explain.	
Transfer to: Check one. Note: "STABILIZATION" and "REHAB" transfers may occur at pre-designated drop-off locations.		Transferor's Printed Name: /	
Receiver's Printed Name: /		Signature: /	
Affiliation: /		Signature: /	
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)

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

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

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

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

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: Wildlife, Task Force 1, Strike Team 1 or WL TF1, ST1).
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: 06/05/2010) Time: Record the time; include AM or PM.		
Capture Location Name: Place name where the animal was caught (Ex: Growler Bay)		
LAT/LONG: GPS point for the capture location in decimal degrees (information should be the same as on LIVE Animal Capture Form).		
Capture Team Gave the Animal TO: Log the name of the signatory (Receiver) on the LIVE Animal Capture Form, their Transportation Name or Call Sign, and their Affiliation or ICS Position. Write the Date/Time that the Animal was given to the noted person. Include AM or PM.		
Note: Add any information that may assist rehabilitators in evaluating and treating the animal. Use space below entry as needed.		
THIS FORM STAYS WITH THE CAPTURE TEAM		

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

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

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

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

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)

9740.3.5 - Checklist: Vessel Grounding or Sinking Response⁸

1. Preventing Rat Introduction on the Pribilof Islands (see Section 3630.1):

Does the stricken vessel have rats on board, or has it ever tied up at a port that has rats? (See [Figure 9-10](#), [Table 9-11](#), and [Table 9-12](#))

- ☐ NO
- ☐ YES → Is the vessel near a rat-free location, especially in the Alaska Maritime National Wildlife Refuge or the Pribilof Islands?
 - ☐ NO
 - ☐ YES → Notify Unified Command
 - Notify Liaison Officer
 - Notify USFWS Oil Spill Response Coordinator (907-242-6893, fwsakspillresponse@fws.gov)

2. ENTANGLEMENT (see Section 3630.2):

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

- ☐ NO
- ☐ YES → Describe the type, size, and deployment details:
 - Nets: What type? How large? Are they fully deployed?
 - Lines: How long? Anchor, long-line, baited?
 - Pots: Long-line pots or standard?
 - Is the deployed gear attached to the vessel?
 - ☐ NO
 - ☐ YES

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

- ☐ NO
- ☐ YES → Describe as completely as possible:

3. DISPOSAL OF ON-BOARD CATCH (see Section 3630.3 in the Alaska WPG):

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

- ☐ NO

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

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

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

- ☐ NO
- ☐ YES → Notify Unified Command.
 - Consult with NMFS, USFWS, and ADF&G to avoid disposing of catch in a manner that could attract or sicken wildlife.
 - If disposal is proposed in ocean waters, as defined under the Marine Protection, Research, and Sanctuaries Act (MPRSA), 33 USC 1402(b)⁹, contact EPA Alaska Operations Office, (907) 271- 5083. Permitting exclusions may apply, depending on disposal location.
 - If disposal is proposed in state waters shoreward of the baseline,¹⁰ verbal or written authorization is required from the ADEC Environmental Health Division. If disposal is proposed in state waters seaward of the baseline¹¹, verbal or written authorization is required from the ADEC Environmental Health Division and EPA. Contact ADEC at (907) 269-7681.

4. INVASIVE SPECIES OTHER THAN RATS (see Section 3630.4 in the Alaska WPG):

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

- ☐ NO
- ☐ YES → Consult with NMFS, USFWS, and ADF&G on possible exposure pathways and species (see the ADF&G Invasive Species webpage).

5. OTHER IMPACTS (see Section 3630.5 of the Alaska WPG):

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

- ☐ NO
- ☐ YES → Notify Unified Command.
 - Contact EPA if scuttling is proposed in MPRSA-defined ocean waters (see the EPA Disposal of Vessels at Sea 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.

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

5b. Is there fish or seafood on board?

- ☐ NO
- ☐ YES → Return to Question 3, above.

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

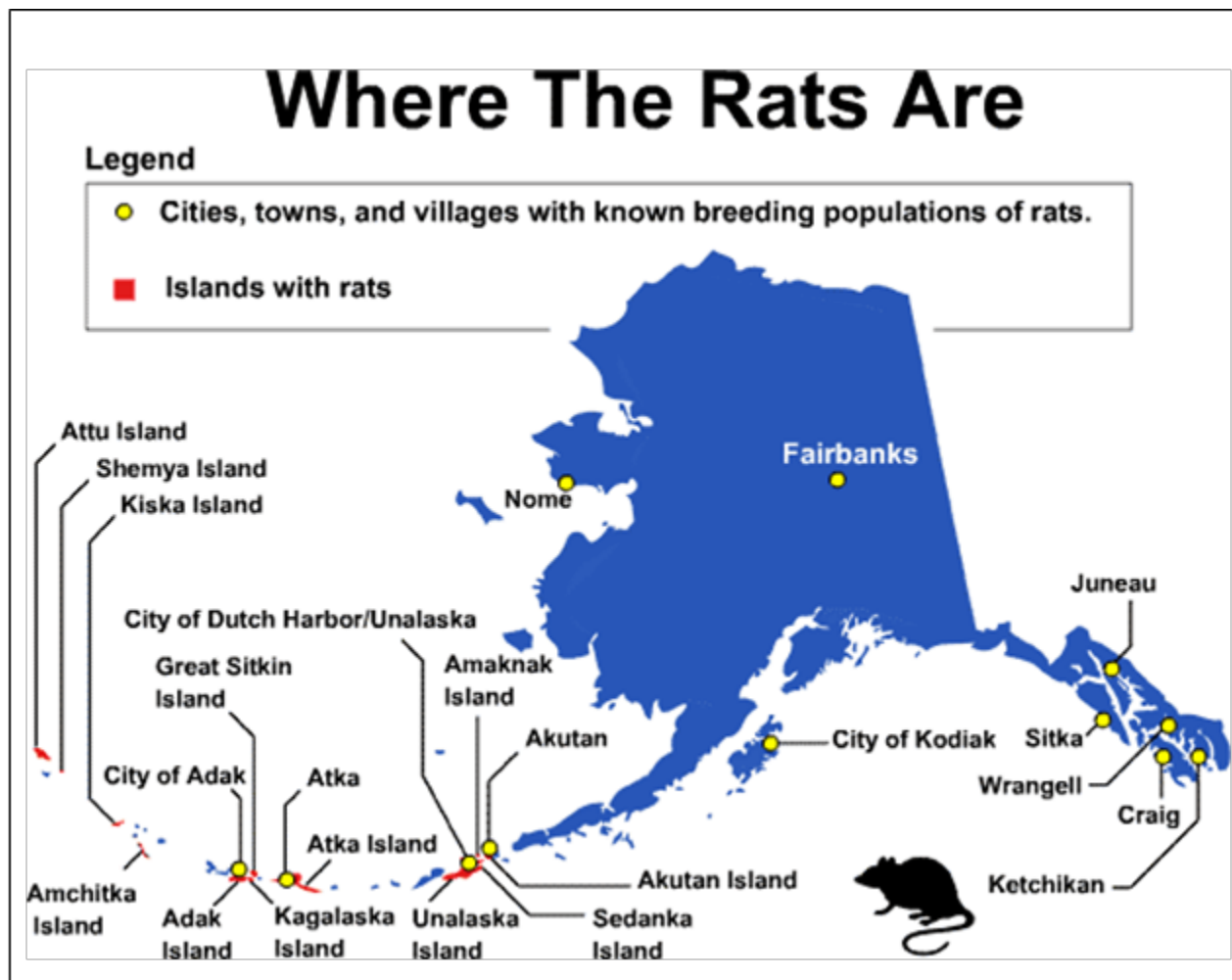


Figure 9-10. Location of Known Breeding Populations of Rats in Alaska. Source: ADF&G [Invasive Species – Norway Rat \(*Rattus norvegicus*\)](#) webpage.

Table 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
Atka	Fairbanks	Kodiak	Wrangell

Table 9-12. Islands in the Alaska Maritime National Wildlife Refuge (NWR) known to have rats. All other islands in the Alaska Maritime NWR should be considered to be rat-free.

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

9740.3.6 - Rat Prevention Guidelines for Vessels¹²

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

Be Knowledgeable and Ready

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

Run a Rat-free Boat

- When tying up in port, look for ways rats could board your boat, and take steps to stop them. Rats are excellent climbers, jumpers, and swimmers.
- Use rat guards on tie-up lines where appropriate.
- Because rats are nocturnal, night lighting on gangways and ramps can discourage their use by rats.
- Seal entry points to your vessel’s interior, such as cable chases, and put screens or louvers over windows and vents.

¹² Adapted from information available on the [StopRats.org](https://www.stoprats.org) webpage; a standalone version of these guidelines can be found on the ADEC [Area Plan References and Tools](#) webpage.

- Inspect and shake out fishing nets and lines before taking them aboard. Rats like to nest and shelter in trawl and seine nets and coils of groundline. Most gear storage facilities do NOT have rat control programs. Soap does not work to protect stored nets from rat damage.
- Inspect cargo for evidence of rats. Rats can hide in containers and in pallets.

Kill Rats that Get Aboard

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

Speak Up and Spread the Word

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

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

Template forms used by the USCG, NMFS, and USFWS in Alaska for initiating ([Figure 9-11](#)) and concluding ([Figure 9-12](#)) the emergency ESA section 7 consultation for incident response actions follow.

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

**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.

Figure 9-11. Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7 Consultation Initiation Form (full-page version available on the ADEC [Area Plan References and Tools](#) webpage). Contact NMFS or USFWS for the most recent version.

Figure 9-11 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 ☐	NAME: U.S. Fish & Wildlife Service EMAIL: fwsakspillresponse@fws.gov	Cell: 907-242-6893 Alt.: 907-750-8527								
NMFS ☐	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:								
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%; padding: 5px;">LOCATION TYPE <i>Check all that apply</i></th> <th style="width: 70%; padding: 5px;">NAME/LANDMARKS</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Port/Industrial</td> <td rowspan="5"></td> </tr> <tr> <td style="padding: 5px;">Riverine/Wetland</td> </tr> <tr> <td style="padding: 5px;">Inshore/Estuarine</td> </tr> <tr> <td style="padding: 5px;">Nearshore/Coastal</td> </tr> <tr> <td style="padding: 5px;">Offshore/EEZ</td> </tr> </tbody> </table>			LOCATION TYPE <i>Check all that apply</i>	NAME/LANDMARKS	Port/Industrial		Riverine/Wetland	Inshore/Estuarine	Nearshore/Coastal	Offshore/EEZ
LOCATION TYPE <i>Check all that apply</i>	NAME/LANDMARKS									
Port/Industrial										
Riverine/Wetland										
Inshore/Estuarine										
Nearshore/Coastal										
Offshore/EEZ										
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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Figure 9-11 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/vacuuming			
Barriers/Berms/Fences			
Trenching			
Flooding/Flushing			
Oiled Vegetation Removal			
Debris Removal (oiled & unoled)			
Sediment Removal/Mixing			
Vessel/Container Removal			
Explosives			
Subpart J Countermeasures			
Dispersants			
In Situ Burn			
Solidifiers			
Surface Washing Agents			
Wildlife Response Tactics			
Carcass Collection			
Wildlife Hazing			
Pre-emptive Capture			
Wildlife Capture/Rehab			
Other Options for Consideration			

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

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Figure 9-11 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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Figure 9-11 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 (STEL)				
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 9-11 continued

ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT CONSULTATION INITIATION		
Check all that apply	ESA Protection Measures ⁸	Implemented? Y / N
Wildlife Observers		
	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.	
	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		
	Response vessel operators shall avoid close approach (<300-500 feet) to whales and pinnipeds in the water.	
	Vessel speeds shall be reduced to <13 knots when marine mammals sighted within 1,000 feet.	
	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		
	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)		
	Implement 1,500 foot no-entry buffers around known or observed haulouts or rookeries to prevent shoreside responders from chasing animals into the water.	
	Notify all shoreside responders to look for and avoid disturbing (1,500 foot buffer) hauled out pinnipeds.	
Dispersant Use		
	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).	
	Limit the total amount of dispersant used in a single incident to minimize the risk to pelagic species and their prey.	
	Implement buffer zones around area of high wildlife concentrations (e.g., haulouts or rookeries) to minimize exposure.	
In-Situ Burns		
	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.	
	Wildlife Observers will be present to locate species of concern near a proposed burn site, and monitor throughout the activity to ensure that no wildlife approaches or becomes entrained in the fire booming. All wildlife will be reported to the Wildlife Branch or Environmental Unit.	
⁸ Mitigation Measures, Reasonable & Prudent Measures (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. ⁹ Sometimes referred to as "Protected Species Observers."		
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Figure 9-11 continued

[illegible]

NMFS # _____	USFWS # _____								
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT									
This document is intended to complete emergency consultation with the National Marine Fisheries Service and U.S. Fish & Wildlife Service (the Services) for species listed, and critical habitat designated under, the Federal Endangered Species Act (ESA). The information provided within is the final step in the request for concurrence that emergency spill response activities undertaken did not adversely affect federally listed species and/or critical habitat. This form is not intended to alter any provisions of the Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities signed by six federal agencies in 2001.¹ This post-response documentation should be completed and submitted to the Service(s) emergency contact as soon as possible after all response activities have been concluded. Emergency Contact: The Services should be contacted as soon as possible by telephone and email at: <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> 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. *IMPORTANT* This consultation has been issued an Environmental Consultation Organizer identification number (ECO#) by NMFS which will remain open until NMFS consultation is complete. This consultation has been issued an Environmental Online Conservation System – Tracking and Integrated Logging System (ECOS – TAILS) identification number by USFWS, which will remain open until USFWS consultation is complete.		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						
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 9-12. Alaska Region Spill Response Emergency Endangered Species Act (ESA) Section 7 Post-Response Consultation Close-Out Form (full-page version available on the ADEC [Area Plan References and Tools](#) webpage). Contact NMFS or USFWS for the most recent version.

Figure 9-12 continued

NMFS # _____	USFWS # _____	
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT		
TIME & DATE OF TRANSMITTAL:		
FROM: FOSC U.S. Coast Guard	NAME: EMAIL:	Off.: Cell:
TO: USFWS ☐	NAME: U.S. Fish & Wildlife Service EMAIL: fwsakspillresponse@fws.gov	Cell: 907-242-6893 Alt.: 907-750-8527
NMFS ☐	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: ☐ chart or map showing the location of the incident ☐ photograph of the incident		
INCIDENT SUMMARY (Describe the incident, briefly.) 		
RESPONSE ACTIONS (Provide a brief summary of the actions taken in response to the incident.) 		
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Figure 9-12 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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Figure 9-12 continued

NMFS # _____	USFWS # _____
ALASKA REGION SPILL RESPONSE EMERGENCY ENDANGERED SPECIES ACT POST-RESPONSE CONSULTATION CLOSE-OUT	
CONCLUSION (Based on the information above, provide a determination of effects to Federally Listed Species.) 	
LESSONS LEARNED (Briefly, discuss lessons learned from this incident response that may be applied to future responses affecting Federally Listed Species.) 	
SIGNATURE (Include contact information and date.) 	
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9740.3.8 - Wildlife Response Plans (WRPs)

The following sections contain both the Startup and Comprehensive WRP forms (Sections [9740.3.8.1](#) and [9740.3.8.2](#), respectively). Both WRPs include requests to conduct primary, secondary, and tertiary response strategies. For more information about these forms see Section [3650](#).

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

9740.3.8.1 - Startup WRP

The Startup WRP ([Figure 9-13](#)) is a request to begin the process of authorizing all or some portion of wildlife response strategies to be conducted for up to 72 hours after the start of a spill response. Pre-emptive capture may only be requested using a Comprehensive WRP (i.e., a Startup WRP may not be used to request pre-emptive capture; see Alaska WPG Sections 3640.2.2.2, 3650.2, and 9740.3.8.2). For more information about the Startup WRP form see Section [3650.1](#).

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

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:
☐ Amendment/update (all previous versions must be attached)		
Attachments:		
☐ Location map/sketch (ICS 201) or narrative ☐ Incident Status Summary (ICS 209) or narrative ☐ Resources at Risk (ICS 232) ☐ ESA section 7 consultation documents ☐ Completed Wildlife Observation Forms ☐ Other _____	☐ Pre-Issued ADF&G Wildlife Response Permits ☐ Pre-Issued USFWS permits (attach first page with Permit No.) or authorizations ☐ Pre-Issued NMFS authorizations (attach first page with Authorization No.)	
II. State and Federal On-Scene Coordinator Response to Request		
State On-Scene Coordinator's decision regarding proposed wildlife response activities:		
Time Received:	Date Received:	
☐ Concur with wildlife agencies. ☐ 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:	
☐ Concur with wildlife agencies. ☐ Do not concur for the following reason(s):		
Signature:		
Time:	Date:	
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Figure 9-13. Startup Wildlife Response Plan (WRP) (17 pages; full-page version available on the [ADEC Area Plan References and Tools](#) webpage).

Figure 9-13 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:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
USFWS Recommendation/Decision:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
NMFS Recommendation/Decision:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
Acronyms in Startup WRP		
ADF&G = Alaska Department of Fish and Game BIA = Biologically Important Area (https://coast.noaa.gov/digitalcoast/data/biologicallyimportantareas.html) ESA = Endangered Species Act ICS = Incident Command System IMT = Incident Management Team LOA = Letter of Authorization MMHSRP = Marine Mammal Health and Stranding Response Program MMPA = Marine Mammal Protection Act	NMFS = National Marine Fisheries Service OLE = Office of Law Enforcement OSRO = Oil Spill Removal/Recovery Organization PRAC = Primary Response Action Contractor RP/PRP = Responsible Party/Potential Responsible Party 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 9-13 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies				
Part A – Species and Habitats				
<i>This section to be filled out by RP/PRP.</i> 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.				
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
<i>Migratory birds</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Eagles</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Non-migratory birds</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____	<i>Sea otters</i> ☐ YES ☐ NO How many? _____ _____ <i>Walruses</i> ☐ YES ☐ NO How many? _____ _____ <i>Polar bears</i> ☐ YES ☐ NO How many? _____ _____	<i>Whales</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Seals</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Sea lions</i> ☐ YES ☐ NO How many? _____ _____ <i>Porpoises or Dolphins</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____	<i>Brown or black bears</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Ungulates</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Furbearers</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____	<i>Fish</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Shellfish</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____ <i>Invertebrates</i> ☐ YES ☐ NO How many? _____ Which species? _____ _____

continued on next page

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Figure 9-13 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
<i>ESA-listed Species</i> What ESA-listed species or critical habitat are or may be in the area?					
<i>All Wildlife</i> Where/how close are wildlife to the spill and trajectory?					
<i>All Wildlife</i> Which sensitive life stages or habitats could be affected by the spill or by the response activities?	☐ Colonies ☐ Nests: Incubating or with hatchlings ☐ Migration or staging area ☐ Fledglings ☐ Active eagle nests	☐ Haulouts ☐ Pupping ☐ Dens	☐ Haulouts ☐ Rookeries ☐ Lairs ☐ BIAs	☐ Dens ☐ Insect relief ☐ Calving or lambing areas	☐ Eggs/larvae ☐ Migration corridor ☐ Anadromous water body

continued on next page

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Figure 9-13 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. Is carcass collection proposed within 72 hours after the start of the spill?	Migratory birds ☐ YES ☐ NO	Sea otters ☐ YES ☐ NO	Whales ☐ YES ☐ NO	Brown or black bears ☐ YES ☐ NO	Fish ☐ YES ☐ NO
	Eagles ☐ YES ☐ NO	Walruses ☐ YES ☐ NO	Seals ☐ YES ☐ NO	Ungulates ☐ YES ☐ NO	Shellfish ☐ YES ☐ NO
	Non-migratory birds ☐ YES ☐ NO	Polar bears ☐ YES ☐ NO	Sea lions ☐ YES ☐ NO	Furbearers ☐ YES ☐ NO	Invertebrates ☐ YES ☐ NO
			Porpoises or Dolphins ☐ YES ☐ 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. Is hazing/deterrence proposed within 72 hours after the start of the spill?	Migratory birds ☐ YES ☐ NO	Sea otters ☐ YES ☐ NO	Whales ☐ YES ☐ NO	Brown or black bears ☐ YES ☐ NO	
	Eagles ☐ YES ☐ NO	Walruses ☐ YES ☐ NO	Seals ☐ YES ☐ NO	Ungulates ☐ YES ☐ NO	
	Non-migratory birds ☐ YES ☐ NO	Polar bears ☐ YES ☐ NO	Sea lions ☐ YES ☐ NO	Furbearers ☐ YES ☐ NO	
	☐ PASSIVE ONLY	☐ PASSIVE ONLY	Porpoises or Dolphins ☐ YES ☐ NO	☐ 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

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Figure 9-13 continued

STARTUP Wildlife Response Plan				
IV. Request for Startup of Wildlife Response Strategies <i>Part B – Proposed Response Strategies (continued)</i>				
Tertiary Response Strategy – <i>Capture, Transport, Stabilization, Rehabilitation</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
3. <i>Is capture, transport, stabilization, or rehabilitation proposed within 72 hours after the start of the spill?</i>	Migratory birds ☐ YES ☐ NO	Sea otters ☐ YES ☐ NO	Whales ☐ YES ☐ NO	Brown or black bears ☐ YES ☐ NO
	Eagles ☐ YES ☐ NO	Walruses ☐ YES ☐ NO	Seals ☐ YES ☐ NO	Ungulates ☐ YES ☐ NO
	Non-migratory birds ☐ YES ☐ NO	Polar bears ☐ YES ☐ NO	Sea lions ☐ YES ☐ NO	Furbearers ☐ YES ☐ NO
			Porpoises or Dolphins ☐ YES ☐ 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)				

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Figure 9-13 continued

STARTUP Wildlife Response Plan					
IV. Request for Startup of Wildlife Response Strategies					
Part C – Supporting Information for Proposed Response Strategies					
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
A. Status of permits and authorizations for carcass collection? ➤ If pre-issued, list permit or authorization number.	☐ Requesting ☐ Pre-issued (non-migratory birds only)	☐ Requesting	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued
B. Who will collect carcasses (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. ➤ What is their status (on alert/standby, mobilizing, on site and ready, etc.)? ➤ When will they arrive at the field/spill site?					
C. What equipment will be used for carcass collection activities? ➤ When will it arrive at the field/spill site?					
D. How will carcasses be transported from the field to the morgue or staging area? ➤ When will transportation be fully operational?					

continued on next page

Figure 9-13 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.					

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Figure 9-13 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.	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued
B. Are any of the following present in the area where hazing is proposed?	☐ ESA-listed species ☐ Molting waterfowl ☐ Colonies ☐ Migration or staging area ☐ Nests: Incubating or with hatchlings ☐ Fledglings ☐ Active eagle nests	☐ ESA-listed species ☐ Haulouts ☐ Polar bear dens	☐ ESA-listed species ☐ Haulouts ☐ Rookeries ☐ Pups ☐ Lairs ☐ BIAs	☐ Dens ☐ Insect relief ☐ 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?				

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Figure 9-13 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
D. Who will conduct deterrence/hazing activities (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. ➤ Describe applicable training or expertise. ➤ What is their status (on alert/standby, mobilizing, on site and ready, etc.)? ➤ When will they arrive at the field/spill site?				

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Figure 9-13 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 9-13 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.	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ Pre-issued	☐ Requesting ☐ 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 9-13 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.				

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Figure 9-13 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?				

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Figure 9-13 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 9-13 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 ☐ _____ ☐ _____
Secondary Response Strategies – Hazing/Deterrence ☐ To ensure non-target species are not inadvertently hazed, active hazing/deterrence must cease if the following species are within _____ m (_____ ft) of the spill site or areas where hazing is proposed: _____ Hazing may not resume until these species have left the area of their own accord. ☐ Hazing/deterrence may not occur in areas where molting waterfowl are observed. ☐ Hazing/deterrence may not occur within _____ m (_____ ft) of _____. ☐ Report observations of _____ to _____. ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team). ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network). ☐ Hazing/deterrence activities must be monitored by one or more Wildlife Observers (see WPG Tactic Wildlife Reconnaissance), as needed. ☐ _____ ☐ _____
Tertiary Response Strategies – Capture, Transport, Stabilization, and Rehabilitation ☐ Report observations of _____ to _____. ☐ Report observations of _____ to USFWS as soon as possible at 907-242-6893 (USFWS Alaska Region Spill Response Team). ☐ Report observations of _____ to NMFS as soon as possible at 877-925-7773 (Alaska Marine Mammal Stranding Network). ☐ Tertiary response activities must be monitored by a Wildlife Observer (see WPG Tactic Wildlife Reconnaissance). ☐ _____ ☐ _____

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Figure 9-13 continued

STARTUP Wildlife Response Plan	
VII. Worksheet for Operations Section and Field Personnel	
<i>This section to be filled out by the RP/PRP.</i>	
Instructions: List conditions, stipulations, and protection measures of permits and authorizations as they are finalized and issued. This Worksheet is intended to help convey pertinent details of authorized wildlife response activities from the Environmental Unit to Operations and field personnel. The Environmental Unit Lead or their designee should read and review permits, authorizations, and ESA section 7 consultation information as they are issued/finalized, and include pertinent protection measures, stipulations, and other conditions for Operations to inform and direct field personnel (e.g., in ICS 204s). This information should be transferred to Section XII of the Comprehensive WRP. This Worksheet does not replace or negate any information found in permits and authorizations. Wildlife agencies may assist with this, but <i>the permittee or RP/PRP is ultimately responsible for all actions conducted under the authority of each issued permit or authorization.</i>	
Startup Wildlife Response Plan – Version 2020.1	
END OF STARTUP WILDLIFE RESPONSE PLAN	
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9740.3.8.2 - Comprehensive WRP

The Comprehensive WRP ([Figure 9-14](#)) should be completed and approved by the wildlife agencies and the Unified Command before any carcass collection, hazing/deterrence, pre-emptive capture, or capture and rehabilitation activities begin or before the Startup WRP expires. For more information about this form, see Section [3650.2](#).

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

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:
☐ Amendment/update (all previous versions must be attached)		
Attachments:		
☐ Location map/sketch (ICS 201) or narrative ☐ Incident Status Summary (ICS 209) or narrative ☐ Resources at Risk (ICS 232) ☐ ESA section 7 consultation documents ☐ Completed Wildlife Observation Forms ☐ Other _____	☐ Startup WRP ☐ Pre-Issued ADF&G Wildlife Response Permit(s) ☐ Pre-Issued USFWS permits (attach first page with Permit No.) or authorizations ☐ Pre-Issued NMFS authorizations (attach first page with Authorization No.)	
II. State and Federal On-Scene Coordinator Response to Request		
State On-Scene Coordinator's decision regarding proposed wildlife response activities:		
Time Received:	Date Received:	
☐ Concur with wildlife agencies. ☐ 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:	
☐ Concur with wildlife agencies. ☐ 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 9-14. Comprehensive Wildlife Response Plan (WRP) (16 pages; full-page version available on the ADEC [Area Plan References and Tools](#) webpage).

Figure 9-14 continued

Comprehensive Wildlife Response Plan		
III. Wildlife Agency Response to Request		
ADF&G Recommendation/Decision:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
USFWS Recommendation/Decision:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ Deny requested activities for the following reason(s):		
Signature:	Date:	Time:
NMFS Recommendation/Decision:		
☐ Approve requested activities as proposed ☐ Approve requested activities as amended ☐ 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 9-14 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			
↓			Primary ↓ Carcass Collection	Secondary ↓ Haze/Deter	Pre-emptive Capture	Tertiary ↓ Capture and Rehab
Species Group	Yes	Species, numbers (estimated or observed), and location relative to spill, etc.	Yes	Yes	Yes	Yes
Bald or golden eagles	☐		☐	☐	☐	☐
Raptors	☐		☐	☐	☐	☐
Waterfowl	☐		☐	☐	☐	☐
Diving ducks	☐		☐	☐	☐	☐
Shorebirds	☐		☐	☐	☐	☐
Seabirds	☐		☐	☐	☐	☐
Passerines	☐		☐	☐	☐	☐
Non-migratory birds	☐		☐	☐	☐	☐
Brown or black bears	☐		☐	☐	☐	☐
Ungulates (moose, deer, caribou, etc.)	☐		☐	☐	☐	☐
Small furbearers (fox, muskrat, river otter, etc.)	☐		☐	☐	☐	☐
Wolves	☐		☐	☐	☐	☐
Northern sea otters (Southcentral or Southeast Alaska stocks)	☐		☐	☐	☐	☐
Walrus	☐		☐	☐	☐	☐
Harbor, spotted, or ribbon seals	☐		☐	☐	☐	☐
Northern fur seals	☐		☐	☐	☐	☐
Steller sea lions Eastern DPS	☐		☐	☐	☐	☐
Minke, killer, gray, beluga, or humpback whales (non-ESA-listed)	☐		☐	☐	☐	☐
Dolphins or porpoises	☐		☐	☐	☐	☐
Invertebrates	☐		☐	N/A	N/A	N/A
Fish or shellfish	☐		☐	NA	N/A	N/A
Other	☐		☐	☐	☐	☐

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Figure 9-14 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			
			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	☐		☐	☐	☐	☐
Spectacled eider	☐		☐	☐	☐	☐
Short-tailed albatross	☐		☐	☐	☐	☐
Eskimo curlew	☐		☐	☐	☐	☐
Northern sea otter	☐		☐	☐	☐	☐
Southwest Alaska DPS	☐		☐	☐	☐	☐
Polar bear	☐		☐	☐	☐	☐
Steller sea lion Western DPS	☐		☐	☐	☐	☐
Ringed seal	☐		☐	☐	☐	☐
Bearded seal	☐		☐	☐	☐	☐
Beluga whale Cook Inlet DPS	☐		☐	☐	☐	☐
Blue whale	☐		☐	☐	☐	☐
Bowhead whale	☐		☐	☐	☐	☐
Fin whale	☐		☐	☐	☐	☐
North Pacific right whale	☐		☐	☐	☐	☐
Sei whale	☐		☐	☐	☐	☐
Sperm whale	☐		☐	☐	☐	☐
Humpback whale Mexico or Western North Pacific DPS	☐		☐	☐	☐	☐
Gray whale Western North Pacific DPS	☐		☐	☐	☐	☐
Wood Bison	☐		☐	☐	☐	☐
Leatherback turtle	☐		☐	☐	☐	☐
Green turtle	☐		☐	☐	☐	☐
Loggerhead turtle	☐		☐	☐	☐	☐
Other	☐		☐	☐	☐	☐

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Figure 9-14 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.	
☐ Control and contain the source of the spill. ☐ Mechanical recovery (boom, skimmers, etc.). ☐ Sensitive area protection (booming of anadromous streams, marine mammal haulouts, seabird rookeries, etc.). ☐ Non-mechanical recovery (dispersants or <i>in-situ</i> burning) ☐ Removal of oiled debris (kelp, driftwood, etc.) ☐ Other: _____ ☐ Other: _____	
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Figure 9-14 continued

Comprehensive Wildlife Response Plan	
VI. Carcass Collection 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 VI. 10. Seals) or reference and include applicable attachments.	
1.	List pre-existing permits and authorizations, and those that were obtained for carcass collection through the Startup WRP process.
2.	How will oiled carcasses be observed and reported to Unified Command and wildlife agencies (for example, actively searching collection teams, carcasses reported through opportunistic field observations)?
3.	Describe or indicate on a map where carcasses will be searched for or collected, or where opportunistic observations will occur.
4.	Who will collect oiled carcasses (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 9-14 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 9-14 continued

Comprehensive Wildlife Response Plan	
VII. Hazing/Deterrence 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 VII. 2. Seals) or reference and include attachments.	
1.	List pre-existing permits and authorizations, and those that were obtained for hazing/deterrence through the Startup WRP process.
2.	Which species/species groups are intended to be hazed/deterred?
3.	What non-target species might be in the area that could be inadvertently hazed/deterred? What methods will be employed to avoid hazing/deterrence of non-target species?
4.	Describe or indicate on a map areas where wildlife will be deterred/hazed from (for example, priority response areas or as wildlife are encountered). Describe nearby suitable habitat where wildlife are intended to be hazed to, including distance and direction from their current location.
5.	Who will be conducting hazing/deterrence activities (RP/PRP staff, OSRO/PRAC, contractor, other)? List all if multiple. Describe applicable training or expertise, 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.

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Figure 9-14 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 9-14 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 9-14 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 9-14 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 9-14 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 9-14 continued

Comprehensive Wildlife Response Plan						
X. 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 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.						
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 9-14 continued

Comprehensive Wildlife Response Plan	
XII. Worksheet for Operations Section and Field Personnel	
<i>This section to be filled out by the RP/PRP.</i> Instructions: List conditions, stipulations, and protection measures of permits and authorizations as they are finalized and issued. This Worksheet is intended to help convey pertinent details of authorized wildlife response activities from the Environmental Unit to Operations and field personnel. The Environmental Unit Lead or their designee should read and review permits, authorizations, and ESA section 7 consultation information as they are issued/finalized, and include pertinent protection measures, stipulations, and other conditions for Operations to inform and direct field personnel (e.g., in ICS 204s). Some of this information may be obtained from Section VII of the Startup WRP. This Worksheet does not replace or negate any information found in permits and authorizations. Wildlife agencies may assist with this, but <i>the permittee or RP/PRP is ultimately responsible for all actions conducted under the authority of each issued permit or authorization.</i>	

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END OF COMPREHENSIVE WILDLIFE RESPONSE PLAN

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Figure 9-15. On-Island Oiled Wildlife Contacts: Saint Paul Island.



Figure 9-16. 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

9740.5 - NMFS Marine Mammal Emergency Response Standards

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

Revised February 2023

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

In an effort to assist with emergency response preparedness for marine mammals under NMFS jurisdiction in Alaska, the NMFS Alaska Region Protected Resources Division (AKR PRD) has developed the following general guidelines and standards for response capacity by responsible parties. All disaster response activities involving NMFS trust species must first be authorized under NMFS Marine Mammal Health and Stranding Response Program (MMHSRP) permit #24359 or later.

- **Preparedness and Response Standards and Thresholds (Initial Immediate Response)**
 - Samples: Prepare to sample 50 live or dead pinnipeds (i.e., bearded seal, harbor seal, ribbon seal, ringed seal, spotted seal, northern fur seal, and/or Steller sea lion) the first week. Prepare to sample 5 live or dead cetaceans (i.e., whales and porpoise) the first week. After the first week, the Responsible Party (RP) has the responsibility to fund the storage of carcasses, fund transport to approved facilities for analysis, and fund additional sampling or any live or dead pinnipeds or cetaceans. Sampling shall be performed by an individual or entity approved under NMFS MMHSRP permit #24359.
 - Necropsy: Prepare to necropsy 50 dead pinnipeds and/or cetaceans. Necropsies shall be performed and samples stored by an individual or entity approved under NMFS MMHSRP permit #24359. If mortalities exceed 50 animals, the RP has the responsibility to fund the storage of carcasses and fund transport to approved facilities for analysis.
 - Sample storage: Maintain level of readiness to store 1,000 marine mammal samples, which likely includes multiple samples from individual animals, and therefore, does not represent 1,000 animals. Samples shall be stored by an individual or entity approved under NMFS MMHSRP permit #24359.
 - Cleaning/rehabilitation threshold: The following thresholds apply for live moribund animals whose condition can withstand transport.
 - Pinnipeds: The RP should maintain a level of readiness for 25 live pinnipeds to be cleaned and rehabilitated.
 - ✓ This applies to bearded, ringed, ribbon, spotted, harbor, and northern fur seals and Steller sea lions. However, capturing and cleaning oiled adult Steller sea lions is generally not feasible given their size and the difficulties in their collection and transport, as well as danger to response personnel.

- ✓ It may not be feasible to capture oiled northern fur seals. Human safety must be a primary consideration as it may be dangerous to response personnel to capture oiled fur seal pups because of territorial bulls, and oiled adult fur seals would be extremely dangerous to handle, even if partially debilitated. Also, separating a pup from its mother temporarily may lead to abandonment.
 - ✓ Approved cleaning protocols and practices by species can be found in the Alaska Wildlife Protection Guidelines and NMFS National Marine Mammal Oil Spill Guidelines.
 - ✓ All cleaned pinnipeds must be tagged prior to release to monitor survivorship. Per a request from the Ice Seal Committee, we recommend that ice seals which are transported outside their region of capture not be released back to the wild after rehabilitation. This request does not apply to ice seals captured and cleaned on-site.
- Cetaceans: The RP should maintain a level of readiness for two live small cetaceans (e.g., young beluga whale, young killer whale, or porpoise) to be cleaned and rehabilitated.
- **Readiness Time Horizon**
 - Maintain readiness for additional sampling, necropsies, sample storage, and cleaning/rehabilitation for up to one year post-spill.
 - After the official closure of a spill response, RPs should remain prepared to support NMFS and wildlife response organizations to respond to oil-affected marine mammals under NMFS jurisdiction.
- **Authority**
 - Response authority for oiled marine mammals under NMFS jurisdiction is always retained by NMFS, and interventions can be authorized only by NMFS on a case by case basis. During a spill, authority to respond to oiled marine mammals may be granted under the NMFS MMHSRP permit #24359 issued to Sarah Wilkin and her authorized NMFS Co-Investigators. Pre-authorization is not a component of this response structure.
 - Stranding Agreement (SA) holders alone do not authorize decision-making, handling, sampling, transport, or treatment of oil-affected NMFS species. These activities, as well as all stranding responses involving ESA-listed marine mammals, fall under the NMFS MMHSRP permit #24359 and require NMFS authorization.
- **Spill Response Network Model**
 - Preparedness and response shall be led through a NMFS-approved contractor (e.g., Alaska SeaLife Center [ASLC]) under U.S. Coast Guard's Oil Spill Removal Organization (OSRO) program, after obtaining authorization through NMFS MMHSRP permit #24359. NMFS will provide guidance regarding: 1) marine mammal response standards, 2) training requirements, and 3) regulatory pathways for response authorizations (e.g., authorizing marine mammal responses pursuant to NMFS MMHSRP permit #24359). NMFS will maintain contact information on trained stranding network members and Incident Command System staff. NMFS-approved wildlife responders will facilitate preparedness for the stranding network as a primary field response participant, along

with trained stranding network members. OSROs will need to work with NMFS-approved wildlife response organizations to ensure preparedness levels are sufficient for a rapid response to oiled marine mammal under NMFS jurisdiction. Currently, NMFS does not have the in-house capacity to lead field efforts, so will act in a guidance and oversight capacity through the Wildlife Protection Branch.

- **Adding Stranding Agreement Holders**

- NMFS will continue to approach qualified entities and individuals throughout Alaska to encourage participation and engagement in the Alaska Marine Mammal Stranding Network. Training will need to be provided to new stranding network members at annual stranding network meeting or by other mechanisms.

