Wildlife Protection Guidelines for Spill Response in Alaska: Overview of Changes
Presentations, Part 1

1. Update on the Wildlife Protection Committee and Guidelines
2. Subsistence
3. Wildlife Reconnaissance
4. Permits and Authorization Tables
5. Carcass Collection
Welcome

• Safety Brief
• Introductions
• Ground Rules
Workshop: Wildlife Protection Guidelines for Oil Spill Response in Alaska

Presentations are posted on the Alaska Regional Response Team website and will remain through the public comment period: http://alaskarrt.org/
Overview

- Workshop format and objectives
- What are the *Wildlife Protection Guidelines for Spill Response in Alaska* (WPG)?
- Wildlife Protection Committee
- Why the change?
- What changed?
- Future changes
- Questions
Workshop format and objectives

• Inform public regarding significant revision to WPG
• Advertise upcoming opportunity for public comment
  • Opens January 22, 2020
  • 30-day comment period
• Please hold questions until the end of each talk
• No public testimony today
  • Please submit comments in writing during the comment period
  • Ask questions if you don’t understand something
  • Please be respectful
What are the WPG?

• Guidelines for planning and response - minimize impacts to wildlife during oil spills in Alaska

• Formerly known as Annex G to the Unified Plan

• Revised/updated by the Alaska Regional Response Team’s (ARRT) Wildlife Protection Committee

• Approved by the ARRT chairs
Wildlife Protection Committee

• Standing ARRT committee with charter
• Chaired by the U.S. Department of the Interior
• Wildlife resource agencies
  • U.S. Fish and Wildlife Service
  • National Marine Fisheries Service
  • Alaska Department of Fish and Game
Wildlife Protection Committee

- Other members
  - Aleutian Pribilof Islands Association
  - Chugach Regional Resources Commission
  - Cook Inlet Regional Citizens Advisory Council
  - Defenders of Wildlife
  - International Bird Rescue
  - Alaska Clean Seas
  - Alyeska Pipeline Service Company
  - Alaska Department of Environmental Conservation
  - U.S. Forest Service
  - U.S. Coast Guard
  - U.S. Environmental Protection Agency
Why needed?

National Contingency Plan requires on-scene coordinators to develop plans which minimize risk of injury to fish and wildlife resources and their habitats.
Why needed?

State requirement for contingency plan holders to develop response strategies, procedures, and methods for the protection, recovery, disposal, rehabilitation, and release of potentially affected wildlife.
Why the change?

- Update contacts
- Remedy gaps & known issues
- Follow Area Contingency Plan format
- Make content more responder- and user-friendly
What has changed?

- Formatting and organization
  - Using table of contents of Area Contingency Plans
  - Operations vs. Planning content

```plaintext
3000 – OPERATIONS ................................................................. 1
3600 – WILDLIFE ...................................................................... 1
  3610 – WILDLIFE BRANCH ....................................................... 1
  3620 – WILDLIFE PROTECTION ............................................... 1
  3630 – PRIMARY RESPONSE TACTICS ...................................... 4
  3640 – SECONDARY RESPONSE TACTICS ................................. 18
  3650 – TERTIARY RESPONSE .................................................. 31

4000 – PLANNING .................................................................. 1
4600 – ENVIRONMENTAL UNIT .................................................. 1
  4620 – FISH AND WILDLIFE PROTECTION STRATEGIES ........... 1

4800 – REQUIRED CORRESPONDENCE, PERMITS & CONSULTATION .................................................. 8
  4850 – ENDANGERED SPECIES ACT (ESA) CONSULTATIONS ........ 8
  4880 – PERMITS ................................................................... 12
```
What has changed?

• Goal to make content more responder- and user-friendly

• Major revisions to some sections

• Emphasis on using tables, flow charts, other job aids

• Some text (e.g., history of the WPG) put in appendices
New Content

- Tactics
  - Wildlife Reconnaissance
  - Carcass Collection and Documentation
- ESA Section 7 Consultation Overview
- Vessel Grounding and Sinking Response
- Subsistence
- Natural Resource Damage Assessment and Restoration (NRDAR)
WPG Revision Schedule

• Public comment period
  • Beginning January 22, 2020
  • Alaska Department of Environmental Conservation website
• Review comments, make necessary changes
• Approval/signatures
• Review WPG annually, revise as needed
Potential Future Revisions

• Air, Land, Water Tactical Ops
  • Unmanned Aircraft Systems: wildlife-specific issues
• Hazing Tactic
• Capture and Rehab Tactic
• Improve communications between Environmental Unit and Operations
  • Ensure permitting stipulations are understood by operations and implemented in the field appropriately
Potential Future Revisions

• Position descriptions
• Functional startup checklists for positions and major tactics
• Standards of Response
• Training
• Update Appendices
Thank You!

Questions?
Subsistence Resources

• The importance of subsistence in Alaska cannot be overstated

• Vital to the cultures, economies, food security, and individual and public physical health of many Alaskans
Subsistence Resources

Alaska Native cultures are in part defined by the specific foods, practices, and reciprocal dependence on their traditional lands and waters that subsistence connections create.
Subsistence Resources

- Concerns about food safety common during spills
- WPG focuses on protection of wildlife (including species harvested for subsistence)
  - However, WPG written by wildlife professionals – human risk and consumption advice beyond scope of WPG
- In WPG, subsistence addressed by:
  - Outlining responsibility for subsistence and food safety (Unified Command, Liaison)
  - Emphasizing sharing information with public
  - Providing background and references
Subsistence Resources

• May be identified as a concern in ICS-232 (Resources at Risk) Form

• Unified Command may address public concerns and information needs through sampling of subsistence and/or commercial species

• NRDAR sampling, if conducted, may provide additional data

• Co-management organizations may inform sampling/testing needs to address food safety concerns
Subsistence Resources

• Alaska Department of Environmental Conservation regulates commercial food safety and can provide consumption advice through the Unified Command

• Alaska Department of Health and Social Services can provide consumption advice for non-commercial species
Subsistence Resources

• The rescue, rehabilitation, and release of oiled wildlife is an important response activity.

• Rehabilitated birds of subsistence species will receive bands that indicate the bird has been oiled, rehabilitated, and released to help consumers make informed decisions.
Subsistence Resources

Marine mammal marking techniques will vary by species and incident – agencies will coordinate with subsistence users about appropriate marking methods.
Subsistence Resources

Ensuring Food Safety Following an Oil Spill in Alaska: Regulatory Authorities and Responsibilities

- Report available on the Oil Spill Recovery Institute website [http://www.pws-osri.org/publications/available-reports/]
WILDLIFE PROTECTION GUIDELINES FOR SPILL RESPONSE IN ALASKA:

Wildlife Reconnaissance (Wildlife Recon)
PURPOSE / INTENT

- Get wildlife observations early in and throughout response
- Use same form throughout Alaska
- Set reporting standards and provide instructions for first responder or Wildlife Observer observations
- Recognize that not everyone is a trained observer, but information about “ducks” or “whales” is valuable
Understanding where wildlife resources are is crucial to successful wildlife response.

Wildlife Recon is emphasized throughout the response.
SECTION 9000

9740.3.1 Tactic: Wildlife Observation

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INTRODUCING “TACTICS” IN THE WPG

- “Grab and Go” pages
  - Large Text
  - Simple Format, Clear Language
  - Standard Outline
- Job Aids (for complicated tactics)
- Forms
TACTIC: WILDLIFE RECONNAISSANCE (RECON)

Objective and Strategy

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

Tactic Description

- Look for, record information, and report wildlife that are:
  - In oiled areas;
  - In areas at risk of becoming oiled; and
  - Where affected wildlife are likely to travel (e.g., onshore).

- At a minimum, report this information:
  - **What kind, and how many?** (e.g., flock of 10 ducks, pod of 5-10 killer whales, 3 large whales and 5 seals)
  - **What were they doing?** (e.g., flying away from response boats, feeding in the area, hauled-out, floating/sitting in the water, transiting in a northerly direction)
  - **Where are they?** (preferably latitude/longitude, but could also be description, e.g., “nearshore/shoreline approximately 1 kilometer west of oil, in [name of] Bay”)
  - **Any other details** (e.g., degree of oiling).
  - Photos and video are helpful.

- Wildlife Observers follow general or spill-specific protocols to systematically search for, identify, record, and report marine and terrestrial mammal, bird, and fish observations in the vicinity of the spill and response activities. They:
  - Survey numbers of wildlife using replicable methods;
  - Collect or verify baseline information;
  - Identify priority species and habitats;
  - Locate oiled individuals; and
### Equipment, vehicles or vessels, and personnel for wildlife recon tactic.

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Quantity</th>
<th>Function/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Binoculars</td>
<td>1</td>
<td>Observe and identify wildlife to species.</td>
</tr>
<tr>
<td>GPS (with track-line function if available)</td>
<td>1</td>
<td>Set to Datum WGS84. Track-line can be uploaded to GIS.</td>
</tr>
<tr>
<td>Camera (with geo-referencing if available)</td>
<td>1</td>
<td>For documenting large groupings or significant observations. Geo-referenced photographs can be uploaded to GIS.</td>
</tr>
<tr>
<td>Wildlife Observation Forms</td>
<td>10</td>
<td>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.</td>
</tr>
<tr>
<td>Incident-specific Wildlife Observation Protocol</td>
<td>1</td>
<td>Allows designated Wildlife Observers to collect comprehensive and scientifically defensible Wildlife Observations. If no incident-specific plan developed, follow Wildlife Recon Tactic.</td>
</tr>
<tr>
<td>Pens/pencils</td>
<td>5 each</td>
<td></td>
</tr>
<tr>
<td>PPE</td>
<td>As needed for each responder</td>
<td>Protect personnel from platform-specific hazards. Platform-specific (e.g., PFD for boat-based surveys)</td>
</tr>
</tbody>
</table>

#### VESSEL/VEHICLES

<table>
<thead>
<tr>
<th>Varies. May include trucks, ATVs, boats, or aircraft.</th>
<th>Quantity</th>
<th>Function/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Varies with incident</td>
<td></td>
<td>Enable Wildlife Observers to access survey area and conduct survey.</td>
</tr>
</tbody>
</table>

#### PERSONNEL

<table>
<thead>
<tr>
<th>Field Team Leader</th>
<th>TACTIC-SPECIFIC TRAINING</th>
<th>QUANTITY</th>
<th>Function/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Experience using binoculars to find and identify wildlife, and experience and training in identifying wildlife species in Alaska.</td>
<td>Varies with incident</td>
<td>Serves as primary Wildlife Observer; supervises field operations and is responsible for communication with Incident Command.</td>
</tr>
<tr>
<td>Wildlife Observer</td>
<td>Same as Field Team Leader</td>
<td>Varies with incident</td>
<td>Observe wildlife; record data.</td>
</tr>
<tr>
<td>Any Responder</td>
<td></td>
<td></td>
<td>Communicate any wildlife observations especially in first 24-48 hours of spill, to supervisor or Unified Command.</td>
</tr>
</tbody>
</table>
Standard Outline (cont.):

**Implementation (step by step)**

**Deliverables**

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

**Related Tactics**

**References**
## Wildlife Observation Form

**Return form(s) to Supervisor, Wildlife Branch, or wildlife agency representative**

**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**:

<table>
<thead>
<tr>
<th>GPS Datum</th>
<th>Camera &amp; SD Card ID #</th>
</tr>
</thead>
<tbody>
<tr>
<td>WGS84 (preferred)</td>
<td></td>
</tr>
<tr>
<td>NAD83</td>
<td></td>
</tr>
<tr>
<td>NAD27</td>
<td></td>
</tr>
<tr>
<td>Other:</td>
<td></td>
</tr>
</tbody>
</table>

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 □

<table>
<thead>
<tr>
<th>Time</th>
<th>Latitude (decimal degrees)</th>
<th>Longitude (decimal degrees)</th>
<th>Species/Species Group</th>
<th>ID Certainty</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Details**: **START SURVEY** (write time, location)
**Example:**

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

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

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

*Wildlife Observation Form - Version 12/2019 (back page)*
SUMMARY – QUESTIONS?

- Get wildlife observations early in and throughout response
- Use same form throughout Alaska
- Set reporting standards and provide instructions for first responder or Wildlife Observer observations
- Recognize that not everyone is a trained observer, but information about “ducks” or “whales” is valuable, especially early in response
Permits and Authorizations Made Easy: Tables and Flowcharts

NEW AND EXCITING!
Purpose/Intent

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

<table>
<thead>
<tr>
<th>Strategy or Tactic</th>
<th>Permit or Authorization Needed...</th>
<th>Agency and Species</th>
<th>Permit or Authorization</th>
<th>Additional Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ALL</strong> (e.g., mechanical recovery, boom deployment, on-water recovery, non-mechanical recovery, etc.)</td>
<td>If a federal agency (e.g., USCG, EPA) funds, authorizes, or conducts the response that includes activities that are potentially stressors AND overlaps in time and space with a listed species.</td>
<td></td>
<td></td>
<td>Whenever possible, NMFS and USFWS will combine the initial consultations into one document for efficient incorporation into their response activities.</td>
</tr>
<tr>
<td><strong>Boom in freshwater fish-bearing water bodies</strong></td>
<td>If boom or anchors are placed in freshwater or above mean low tide elevation in anadromous water bodies, or if boom may impede fish passage.</td>
<td>ADF&amp;G</td>
<td>Title 16 Fish Habitat Permit</td>
<td>ESA-listed species or other marine mammals may be feeding in streams and could be unintentionally harassed by deployment of, or become entangled in, boom. These possibilities may require an ESA section 7 consultation and MMPA authorization from NMFS and USFWS.</td>
</tr>
<tr>
<td>Strategy or Tactic</td>
<td>Permit or Authorization Needed...</td>
<td>Agency and Species</td>
<td>Permit or Authorization</td>
<td>Additional Considerations</td>
</tr>
<tr>
<td>-------------------</td>
<td>----------------------------------</td>
<td>-------------------</td>
<td>------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td><strong>Removal of oiled carcasses</strong></td>
<td>Always</td>
<td><strong>USFWS</strong> - migratory birds, sea otters, walruses, polar bears</td>
<td><strong>USFWS</strong> – Incident-specific OLE Authorization for all USFWS species; Migratory Bird Salvage Permit for migratory birds; ESA Section 7 consultation for ESA-listed species; MMPA Section 112(c) authorization for marine mammals (non-government personnel only).</td>
<td>Carcasses must be recorded, reported, and collected or sampled according to protocols outlined in Section 3640.2.1.1 (Carcass Collection and Documentation) and Section 9740.3.2 (Tactic: Collection of Small Carcasses and Documentation of Large Carcasses), OR an agency-approved incident-specific Wildlife Response Plan or Carcass Collection Plan.</td>
</tr>
<tr>
<td><strong>Dispersants</strong></td>
<td>Will be reviewed according to protocols outlined in the Alaska RCP (Part 3. A. Chemical Dispersants).</td>
<td><strong>ADF&amp;G</strong> - terrestrial mammals, non-migratory birds, fish, invertebrates, aquatic plants</td>
<td><strong>ADF&amp;G</strong> - Wildlife Response Permit or Aquatic Resource Permit (varies by species)</td>
<td>Any activity that overlaps in time and space with ESA-listed species and may affect individual animals (e.g., noise, ship strike, dispersants, or other harm or harassment) should be authorized by an ESA Section 7 consultation.</td>
</tr>
<tr>
<td><strong>In situ burning</strong></td>
<td>Will be reviewed according to protocols outlined in the Alaska RCP (Part 3. B. In-Situ Burning of Spilled Oil).</td>
<td><strong>NMFS</strong> - whales, porpoises, seals, sea lions</td>
<td><strong>NMFS</strong> - The NMFS Stranding Response Program holds an existing permit that authorizes personnel covered by the permit to collect oiled carcasses. Authorized NMFS personnel (NMFS Regional Stranding Program Coordinator and associated co-investigators) can provide verbal authorization to others to collect oiled carcasses.</td>
<td>Any activity that overlaps in time and space with ESA-listed species and may affect individual animals (e.g., noise, ship strike, smoke particulates, or other harm or harassment) should be authorized by an ESA Section 7 consultation.</td>
</tr>
</tbody>
</table>
**Table 3-4: Wildlife authorizations and permits for secondary response strategies.**

<table>
<thead>
<tr>
<th>Strategy or Tactic</th>
<th>Permit or Authorization Needed ...</th>
<th>Agency and Species</th>
<th>Permit or Authorization</th>
<th>Additional Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any that may impact ESA-listed species</td>
<td>If a federal agency (e.g., USCG, EPA) funds, authorizes, or conducts response that includes activities that are potential stressors AND overlap in time and space with ESA-listed species.</td>
<td>NMFS - whales,</td>
<td>Emergency ESA Section 7 Consultation</td>
<td>It is imperative, to the extent possible, NMFS and USFWS will consolidate initial consultations into one effort for efficient incorporation into other response activities.</td>
</tr>
<tr>
<td>Any that may impact marine mammals</td>
<td>Always</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bird hazing¹ – passive (visual only)</td>
<td>If eagles may be present</td>
<td>USFWS - eagles</td>
<td>USFWS - Eagle Depredation Permit</td>
<td>Non-government personnel can be authorized to humanely take marine mammals under MMPA section 112(c) during an incident, or as part of the pre-spill planning process.</td>
</tr>
<tr>
<td>Bird hazing¹ – active</td>
<td>Always</td>
<td>ADF&amp;G - birds</td>
<td>ADF&amp;G - Wildlife Response Permit</td>
<td>All bird hazing activities should be addressed in the Startup or Comprehensive WRP to prevent hazing/deterrence of non-target species.</td>
</tr>
<tr>
<td>Terrestrial mammal hazing¹</td>
<td>Always</td>
<td>ADF&amp;G - all</td>
<td>ADF&amp;G - Wildlife Response Permit</td>
<td>All hazing activities should be addressed in the Startup or Comprehensive WRP to prevent hazing of non-target species.</td>
</tr>
</tbody>
</table>

*Reminder: Secondary Response Strategy = Keep wildlife away from the oil.*

Wildlife Protection Guidelines
3000 – Operations

Version 2020, January 2020

<table>
<thead>
<tr>
<th>Strategy or Tactic</th>
<th>Permit or Authorization Needed</th>
<th>Agency and Source</th>
<th>Permit or Authorization</th>
<th>Additional Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any that may impact ESA-listed species</td>
<td>If a federal agency (e.g., EPA) funds, authorizes, or conducts a response that includes activities that are potential stressors AND of an in time and space with the species.</td>
<td></td>
<td>Emergency, ESA Section 7 Consultation</td>
<td>If ever possible, NMFS and USFWS combine the initial consultations into one document for efficient incorporation into other response activities.</td>
</tr>
<tr>
<td>Any that involves marine mammals</td>
<td>Always</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any that involves birds</td>
<td>Always</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Any that involves terrestrial mammals, furbearers, non-migratory birds</td>
<td>Always</td>
<td>ADF&amp;G</td>
<td>Case-by-case authorization or Wildlife Response Permit (varies by species)</td>
<td>All tertiary response activities should be addressed in the Startup or Comprehensive WRP to prevent impacts to non-target species.</td>
</tr>
</tbody>
</table>
Figure 4-1: Carcass collection permits flow chart. (See also Table 3-3 for specific authorization and permit information.)

TIP: If carcass collection of any species is proposed, fill out the Startup or Comprehensive Wildlife Response Plan forms and submit to USFWS, NMFS, & ADF&G.
Figure 4-2: Wildlife hazing/deterrence permits flow chart. (See also Table 3-4 for specific authorization and permit information.)

**Which species?**

- **Birds**
  - ESA-listed species or eagles (if present, whether you intend to haze or not)
    - **USFWS Migratory Bird Salvage Permit, Eagle Depredation Permit, or ESA Section 7 Consultation**
  - All other birds
    - **ADF&G Wildlife Response Permit**

- **Terrestrial Mammals**
  - Black or brown bears, ungulates, terrestrial or aquatic furbearers
    - **ADF&G Wildlife Response Permit**

- **Marine Mammals**
  - Sea otters, polar bears, or walruses
    - **USFWS MMPA Section 112(c) Letter of Authorization and/or ESA Section 7 Consultation**
  - Whales, porpoises, seals or sea lions
    - **NMFS MMHSRP and/or ESA Section 7 Consultation**

**TIP:** If hazing/deterrence of any species is proposed, fill out the Startup or Comprehensive Wildlife Response Plan forms and submit to USFWS, NMFS, & ADF&G.
Figure 4-3: Wildlife capture, transport, stabilization, or rehabilitation permits flow chart. (See also Table 3-5 for specific authorization and permit information.)

**TIP:** If capture, transport, stabilization, or rehabilitation of any species is proposed, fill out the Startup or Comprehensive Wildlife Response Plan forms and submit to USFWS, NMFS, & ADF&G.

- **Which species?**
  - **Birds**
    - Migratory birds, eagles, or ESA-listed species
      - USFWS Migratory Bird Rehab Permit, Eagle Depredation Permit, or ESA Section 7 Consultation
    - Non-migratory birds
      - ADF&G Wildlife Response Permit
  - **Terrestrial Mammals**
    - Black or brown bears, ungulates, terrestrial or aquatic furbearers
      - ADF&G Wildlife Response Permit
  - **Marine Mammals**
    - Sea otters, polar bears, or walruses
      - USFWS MMPA Section 112(c) Letter of Authorization and/or ESA Section 7 Consultation
    - Whales, porpoises, seals or sea lions
      - NMFS MMHSRP and/or ESA Section 7 Consultation
Thanks!
WILDLIFE PROTECTION GUIDELINES FOR SPILL RESPONSE IN ALASKA:
Carcass Collection and Documentation
PURPOSE / INTENT

- Provide guidance on when carcass collection is authorized AND permitted
- Use same form throughout Alaska
- Set reporting and collection standards and provide instructions for carcass collections (small carcasses) and documentation (large carcasses)
<table>
<thead>
<tr>
<th>Strategy or Tactic</th>
<th>Permit or Authorization</th>
</tr>
</thead>
</table>
| Removal of oiled carcasses | **USFWS** – Incident-specific OLE Authorization for all USFWS species; Migratory Bird Salvage Permit for migratory birds; ESA Section 7 consultation for ESA-listed species; MMPA Section 112(c) authorization for marine mammals (non-government personnel only).  
**ADF&G** - Wildlife Response Permit or Aquatic Resource Permit (varies by species).  
**NMFS** - The NMFS Stranding Response Program holds an existing permit that authorizes personnel covered by the permit to collect oiled carcasses. Authorized NMFS personnel (NMFS Regional Stranding Program Coordinator and associated co-investigators) can provide verbal authorization to others to collect oiled carcasses. |
| Always | |
SECTION 9000

9740.3.2 Tactic: Collection of Small Carcasses and Documentation of Large Carcasses
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 environment.

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

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

Operating Environments, Geographic Considerations, and Access
- Carcass collection may be performed in all environments where a spill can occur, including:
  - On land;
  - Lakes, streams, and rivers and associated shorelines;
  - Marine
- Responders may be on land (boat, aircraft) or operate on land ownership.
- While carcass collection may be complex, the species and life stage are crucial.

Species Type and Life Stage
- **Birds and small mammals:** Collect partial carcasses and intact, whole birds and small mammals, regardless of degree of scavenging, disintegration, or decomposition. Do not collect single feathers, or feather or fur clumps, that are not attached to skin or other body part. Collect disarticulated carcasses (those in separate pieces) by bagging and tagging all pieces that likely came from the same animal as one whole animal.
- **Large mammals (adult bears, whales, seals, sea lions, walruses, and some ungulates):** Response personnel should notify Unified Command immediately upon finding carcasses that are too large to be collected. These must be documented by the carcass collection team and may subsequently be sampled by separate agency or authorized personnel. Carcasses of young large mammals such as cubs or calves should be collected when possible. Collect disarticulated carcasses (those in separate pieces) by bagging and tagging all pieces.
- **Other aquatic**
  - 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.
Implementation
1) Preparation:
   a) Obtain PPE, equipment, and personal protective items
   b) Ensure activities can be safely conducted
   c) Determine if Bear Guards are necessary in accordance with Safety Plan.

2) Field Implementation (See Figures 1-3)
   a) RECORDER: Complete top of Chain of Custody (CoC) Tag.
      - Fill out the shoreline search protocol
      - Take photos as needed
   b) COLLECTOR: Wearing new nitrile gloves
      - Do NOT put carcasses directly into the collection bag
      - Do NOT place nitrile gloves on the carcasses
   c) RECORDER: Complete a yellow tag for each carcass.
      - The Carcass Chain of Custody (CoC) Tag # is the Batch Tag No. on the Carcass Chain of Custody (CoC) Tag:
        ![Carcass Chain of Custody Tag]

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

Use one form for each batch of carcasses.

<table>
<thead>
<tr>
<th>Incident Name:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Today's Date (mm/dd/yyyy):</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>INV/OLE Use Only:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>ICS Position (Group, Task Force, Strike Team, or other name if no ICS Position assigned):</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Carcass Collector Name &amp; Employer (Phone &amp; Email, if no ICS position):</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Data Recorder Name &amp; Employer (Phone &amp; Email, if no ICS position):</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Have carcass collection permits &amp; authorizations been obtained? YES □ If not. Do Not Collect Carcasses</th>
</tr>
</thead>
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<table>
<thead>
<tr>
<th>Camera &amp; SD Card ID #:</th>
</tr>
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<table>
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<tr>
<th>GPS &amp; SD Card ID #:</th>
</tr>
</thead>
</table>

<table>
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<tr>
<th>GPS Datum: WGS84 (preferred) □</th>
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<table>
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<tr>
<th>Other:</th>
</tr>
</thead>
</table>

General Location or Shoreline Segment: If applicable, fill out Shoreline Search Information on reverse.

## INDIVIDUAL CARCASS LOG

<table>
<thead>
<tr>
<th>Carcass ID #</th>
<th>Latitude (decimal degrees)</th>
<th>Longitude (decimal degrees)</th>
<th>Species</th>
<th>Condition</th>
<th>Oiling</th>
<th>Photo #</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
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</tbody>
</table>

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.
# Transport Log for CARCASSES

## Form stays with Transport Team

### TRANSPORT TEAM INFORMATION

<table>
<thead>
<tr>
<th>Transportation Name or Call Sign</th>
<th>ICS Position</th>
<th>Data Recorder</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Group, Task Force, Strike Team</td>
<td>Name &amp; Employer (Phone &amp; Email, if there is no ICS position):</td>
</tr>
<tr>
<td><strong>Type</strong>: BOAT ☐ AIRCRAFT ☐ VEHICLE ☐</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### LOG INFORMATION

<table>
<thead>
<tr>
<th>Batch Tag Number</th>
<th>Species or Species Group (bird, sea otter, seal, etc.)</th>
<th>Transporter Received the Carcass(es) FROM</th>
<th>DATE/TIME (MM/DD/YYYY)</th>
<th>Transporter Gave the Carcass(es) TO:</th>
<th>DATE/TIME (MM/DD/YYYY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Found on Carcass Chain of Custody Tag</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 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.

**Transportation Name or Call Sign**: Record boat/vehicle/aircraft name or identifying number.

**Transport Type**: Check appropriate box.

**Data Recorder**: Record information for the person filling out this form.

**ICS Position**: ICS position of the transport boat/vehicle/aircraft. Indicate all areas of assignment. (Ex: Wildlife, Task Force 1, Strike Team 1 or Wi, TF1, ST1).

**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.
Carcass Collection Job Aid

1. Fill out the top section of the Carcass Collection Form. Only fill out the shoreline search section on back of form if instructed to do so by incident-specific protocols.

2. When a carcass is located, place the carcass into a paper bag. Chill wrap large birds or mammals with paper. 

   Note: Do NOT place used gloves in bag with carcass. Do NOT put carcasses directly in plastic bags.

3. Tag the plastic bag with an individual Carcass Identification Tag or a waterproof tag with date, time, location, and collector's name.

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

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

   - Complete the bottom section of the Carcass Collection Form.
   - Fill out the Carcass Chain of Custody Tag and record the pre-printed Batch Tag No. on the Carcass Collection Form.

   - Place all carcasses found in the location in a large plastic bag.
   - Fold the Carcass Collection Form in half, place it in a *Ziplock™* bag, and then place it in the large bag.

   - The bag of carcasses is handed to the transporter.
   - Transporter signs Carcass Chain of Custody Tag and records information in the Transport tag for CARCASSES.
BREAK