23 September 2010

Mr. Timothy J. Van Norman Chief, Branch of Permits Division of Management Authority U.S. Fish and Wildlife Service 4401 North Fairfax Drive Arlington, VA 22203

> Re: Request for Renewal and Amendment of Permit No. MA038448-3 (Iskande Larkin, Ph.D., University of Florida)

Dear Mr. Van Norman:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit renewal request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act.

Permit No. MA038448-3, as amended on 29 June 2007, authorizes the permit holder to take annually by harassment up to five free-ranging female manatees during capture, tagging, sampling, and focal follows and up to 11 (5 captive-held and 6 captive-born) manatees for obtaining samples and ultra-sonograms. The permit also authorizes the taking by harassment of an unspecified number of wild and captive manatees during behavioral observations.

The permit holder is requesting that the permit be amended to authorize the annual harassment of up to five wild male manatees during capture, tagging, and tracking activities and in the course of conducting twice-yearly health assessments; up to 20 captive male and/or female manatees during behavioral observations and collection of fecal and urine samples; and an unspecified number of wild and captive manatees while conducting opportunistic behavioral observations and the collection of fecal samples. The purpose of the proposed research is to obtain information on the reproductive endocrine health of Florida manatees.

## RECOMMENDATIONS

The Marine Mammal Commission recommends that the Fish and Wildlife Service approve the requested permit renewal and amendment, provided that the conditions currently contained in the permit remain in effect. In this regard, the permit holder states that protocols for both the chemosensation and cortisol studies being proposed have been approved by the university's Institutional Animal Care and Use Committee (IACUC). The permit holder plans to provide additional IACUC documentation for the proposed study of male manatee reproduction, which currently is being developed. The permit holder states that he will submit that documentation in his next annual report to the Service. The Marine Mammal Commission recommends that the Fish and Wildlife Service require the permit holder to provide that documentation as soon as it is available and that the Service refrain from authorizing the proposed male reproductive studies until such documentation has been provided and reviewed by the Service.

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The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the Marine Mammal Protection Act.

Please contact me if you have any questions concerning these recommendations.

Sincerely,
Thusthy J. Ragen

Timothy J. Ragen, Ph.D.

Executive Director