



MARINE MAMMAL COMMISSION

10 June 2011

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

Re: Permit Application No. MA-971721
(U.S. Geological Survey, The Sirenia Project)

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 application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act. The applicant is requesting authorization to conduct research on West Indian manatees in the southeastern United States and Puerto Rico during a five-year period. The proposed activities currently are authorized under the same permit number, which the applicant is seeking to renew.

RECOMMENDATIONS

The Marine Mammal Commission recommends that the Fish and Wildlife Service issue the permit, provided that the Service—

- conditions the permit to allow two unintentional serious injuries or deaths during the five-year period but requires suspension of research activities, pending review by the Service, if any death or serious injury occurs;
- takes steps to ensure that activities to be conducted under this permit and those of other permit holders who might be conducting manatee research in the same areas are coordinated and, as possible, data and samples shared to avoid duplicative research and unnecessary disturbance of animals;
- advises the applicant of the need to obtain state permits; and
- requires the applicant to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing or exporting any manatee part and to provide periodic reports to the Service sufficient to demonstrate that each specimen was taken in accordance with the laws of the country of origin and was not taken in violation of the Marine Mammal Protection Act or other applicable U.S. laws.

RATIONALE

The U.S. Geological Survey proposes to conduct research on manatees within U.S. territorial waters in the Atlantic Ocean, the Gulf of Mexico, and Puerto Rico. The purpose of the proposed research is to continue a long-term research project of more than 30 years to study (1) population

size and structure, (2) range and movement patterns, (3) life history parameters, (4) genetics, (5) foraging ecology, and (6) health and disease.

The U.S. Geological Survey seeks authorization to observe, photograph, and videotape 1,500 manatees per year. Researchers under this permit would photograph and videotape manatees from both above the water and in the water. In-water research would be conducted using snorkel gear. Boat tracking and snorkeling activities would be kept to a minimum around free-ranging manatees. The U.S. Geological Survey also would avoid easily disturbed individual manatees during underwater photography sessions.

In addition, the U.S. Geological Survey seeks authorization to harass, capture, handle, restrain, measure, weigh, sample, mark, and attach instruments to various numbers of manatees (Table 1). The applicant would capture animals in nets and transport them to shore or to a boat. U.S. Geological Survey would collect morphometric data, skin, blood, milk, urine, feces, and parasites from each manatee. Skin samples would be collected using a needle biopsy or from the tail using a tool developed to notch the ear of cattle. Skin samples also could be collected from unrestrained, free-ranging manatees using these same methods. Each captured manatee would be marked with two passive integrated transponders (PIT tags), and a subset would be freeze-branded with two brands.

Table 1. Requested annual takes by activity

Activity	Number of manatees per year
Capture, restrain, measure/weigh, sample, and PIT tag	300
Sample skin via tail notch	500
Sample skin via needle biopsy	600
Freeze-brand	20
Attach tag assembly	60
Harass incidentally	5,100

The U.S. Geological Survey would attach a tag assembly on up to 60 manatees per year using a peduncle belt with a flexible nylon tether. The positively-buoyant tag assembly could include VHF, UHF, or GPS transmitters or time-depth recorders. Those assemblies are fabricated with a built-in safety device that allows for detachment if the animal gets entangled in nets, and the assemblies also include a corrodible metal attachment that is designed to detach after two to three years. Very small calves or individuals with severely mutilated tail margins would not be tagged. Special care would be given when handling pregnant and small animals, including mother/calf pairs.

The applicant also seeks authorization to perform necropsies and collect tissue samples (including bone) from salvaged manatee carcasses. Samples could be exported to or imported from international researchers opportunistically. Samples for import may be collected in other countries or may be re-imports of exported samples collected under the permit, if and when issued. The U.S. Geological Survey is not requesting authority for any unintentional injuries or deaths of manatees associated with the proposed activities. However, the Service did authorize two unintentional

Mr. T. Van Norman
10 June 2011
Page 3

injuries and deaths under the previous five-year permit. As such, the Marine Mammal Commission recommends that the Fish and Wildlife Service condition the permit to allow two unintentional serious injuries or deaths during the five-year period but require suspension of research activities, pending review by the Service, if any death or serious injury occurs.

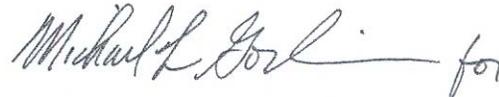
Various researchers are conducting similar activities on manatees at the same time and potentially in the same general locations as the applicant. To minimize duplicative efforts and repeated harassment of individuals, the Marine Mammal Commission recommends that the Fish and Wildlife Service take steps to ensure that activities to be conducted under this permit and those of other permit holders who might be conducting manatee research in the same areas are coordinated and, as possible, data and samples shared to avoid duplicative research and unnecessary disturbance of animals.

The proposed activities have been reviewed and approved by the applicant's Institutional Animal Care and Use Committee, as required by section 2.31 of the Animal and Plant Health Inspection Service's Animal Welfare Act regulations. Also, the applicant may need to obtain additional permits to conduct the proposed activities in certain states. Therefore, the Marine Mammal Commission recommends that the Fish and Wildlife Service advise the applicant of the need to obtain additional permits to conduct research activities in certain states. The Marine Mammal Commission also recommends that the Fish and Wildlife Service require the applicant to obtain all necessary permits under the Convention on International Trade in Endangered Species of Wild Fauna and Flora before importing or exporting any manatee part and to provide periodic reports to the Service sufficient to demonstrate that each specimen was taken in accordance with the laws of the country of origin and was not taken in violation of the Marine Mammal Protection Act or other applicable U.S. laws.

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 the Commission's recommendations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Timothy J. Ragen", followed by the word "for" written in a smaller, simpler font.

Timothy J. Ragen, Ph.D.
Executive Director