



# MARINE MAMMAL COMMISSION

23 December 2015

Mr. Timothy J. Van Norman, Chief  
Branch of Permits, MS: IA  
Division of Management Authority  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803

Re: Permit Application No. 73418B  
(Alaska SeaLife Center)

Dear Mr. Van Norman:

The Marine Mammal Commission (the 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 MMPA). The Alaska SeaLife Center (ASLC) is seeking to renew its permit that authorizes it to collect, rescue, transport, rehabilitate, and release to the wild northern sea otters and walrus during a five-year period—previous activities were authorized under permit 837414.

ASLC is requesting authorization to take northern sea otters of the Southwest distinct population segment (DPS) for the purposes of enhancement associated with rescue, rehabilitation, and release to the wild under section 10 of the Endangered Species Act and all northern sea otter DPSs and walrus under section 109(h) of the MMPA. ASLC would collect, rescue, transport, rehabilitate, and/or release back to the wild live-stranded sea otters and walrus. It also would collect and sample dead sea otters and walrus.

Researchers would harass, disentangle, capture, restrain, handle, transport, administer drugs<sup>1</sup>, measure, sample<sup>2</sup>, conduct diagnostics<sup>3</sup> on, and instrument up to an unlimited number of sick, injured, or abandoned sea otters and walrus of either sex and all age classes each year. All transport procedures would adhere to U.S. Department of Agriculture standards, Convention on International Trade in Endangered Species of Wild Fauna and Flora Guidelines for Transport of Live Animals, and the International Air Transport Association live animal regulations. ASLC also would import samples from sea otters it has exported to Vancouver Aquarium and the National Aquarium of Denmark. Rehabilitated animals to be released back into the wild would be given a physical examination and considered disease free prior to release. Researchers would then attach flipper tags to and insert PIT tags into each of them to aid in post-release monitoring. ASLC also could harass up to 100 non-target sea otters and 100 walrus during the proposed activities.

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<sup>1</sup> Including sedation, anesthesia, and medical treatment.

<sup>2</sup> Including blood, urine, other fluids and secretions (saliva, nasal, ocular, gastric, peritoneal, thoracic, mediastinal), feces, microbiological cultures, and tissue samples (skin, blubber, and other tissue samples).

<sup>3</sup> Including ultrasound, x-rays, endoscopy, laparoscopy, etc.

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In addition, ASLC is requesting authorization for the intentional deaths via euthanasia or unintentional deaths of an unlimited number of sea otters and walruses each year due to the compromised health status of stranded animals. Full post-mortem examinations would be conducted on all of those animals.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that the Fish and Wildlife Service issue the permit, as requested.

Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a large, sweeping initial "R".

Rebecca J. Lent, Ph.D.  
Executive Director