



MARINE MAMMAL COMMISSION

25 January 2016

Ms. Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Application No. 19257
(Ann Zoidis, Cetos Research Organization)

Dear Ms. Harrison:

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). Ms. Zoidis is seeking to renew her permit to conduct research on cetaceans in Hawaii and the Mariana Islands during a five-year period—permit 14353 authorized similar activities.

Ms. Zoidis proposed to conduct research on numerous species of cetaceans in Hawaii and the Mariana Islands on a year-round basis. The purpose of the research is to investigate (1) abundance, distribution, and stock structure, (2) movements and habitat-use patterns, (3) foraging ecology, (4) social interactions and acoustic behaviors, and (5) behavior relative to human disturbance. Ms. Zoidis would harass, observe, photograph¹, acoustically record, biopsy sample, and attach suction-cup tags to numerous cetaceans of either sex each year (see the Take Table). She would not biopsy sample or tag calves or females with those calves, except for humpback whales².

To minimize impacts, Ms. Zoidis would approach the whales slowly and obliquely. Ms. Zoidis would not separate female-calf pairs and would cease activities if any whale reacts strongly (e.g., constantly moving away from the vessel, changes in respiration rates, increased surface activity, changes in direction, premature termination of a surfacing series, tail swishing, or peduncle lobbing) to the activities. She would collaborate with researchers at the Southwest Fisheries Science Center, Pacific Islands Fisheries Science Center, and Cascadia Research Collective. For all of these reasons, the Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that NMFS 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".

Rebecca J. Lent, Ph.D.
Executive Director

¹ Including underwater photography via swimmers using snorkeling gear.

² Calves would be non-neonates and at least half the length of the female.