



# MARINE MAMMAL COMMISSION

16 February 2016

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. 81843B  
(Indianapolis Zoo)

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). Indianapolis Zoo is requesting authorization to take one non-releasable male Pacific walrus for the purpose of public display.

Indianapolis Zoo is requesting to permanently hold a non-releasable male Pacific walrus, Pakak, for the purpose of public display. Pakak was rescued as an abandoned calf near Barrow, Alaska, in June 2012. In October 2012, the U.S. Fish and Wildlife Service (FWS) deemed him non-releasable after determining that Pakak did not demonstrate the skills and abilities needed to survive in the wild. Pakak was subsequently transferred to the Indianapolis Zoo for continued care, where he has remained. The authority under which Pakak is being held in captivity would change from section 109(h) to 104(c) of the MMPA. Indianapolis Zoo (1) is open to the public on a regularly scheduled basis with access that is not limited or restricted other than by charging an admission fee, (2) offers an educational program based on professionally recognized standards, and (3) holds Exhibitor's License 32-C-0001, issued by the U.S. Department of Agriculture under the Animal Welfare Act. The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and therefore recommends that FWS 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