

11 July 2017

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. 20556

(Georgia Department of Natural Resources)

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). Georgia Department of Natural Resources (GA DNR) is seeking to renew its permit to conduct research on North Atlantic right whales (NARWs) in the Atlantic Ocean during a five-year period—permit 15488 authorized similar activities.

GA DNR proposes to conduct research on NARWs in the Atlantic Ocean year-round. The purpose of the research is to (1) contribute to ongoing NARW population monitoring efforts, (2) identify human causes of mortality and serious injury, (3) monitor NARW movements and habitatuse patterns, and (4) assess overall health of NARWs. Researchers would harass, observe/track, photograph/videotape, record acoustically, sample, and/or instrument numerous NARWs of both sexes and various age classes (see the take tables and application for specifics). GA DNR would employ various measures to minimize impacts to NARWs and also would be required to abide by the NMFS's standard permit conditions. GA DNR does not have an Institutional Animal Care and Use Committee (IACUC). Thus, an IACUC at one of the CI's affiliated institutions¹ would review the research protocols. 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,

Rebecca J. Lent, Ph.D.,

**Executive Director** 

Reberea J. henr

<sup>&</sup>lt;sup>1</sup> Either the Northeast Fisheries Science Center or the University of Alaska Fairbanks.