

3 August 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. 21158

(Robert Garrott, Ph.D., Montana State University)

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). Dr. Garrott is seeking to renew his permit to conduct research on Weddell seals in Antarctica during a five-year period—permit 17236 authorized the same activities.

Dr. Garrott proposes to conduct research on Weddell seals primarily from October through December of each year. The purpose of the research is to evaluate how temporal variation in the marine environment affects individual life histories and population dynamics of Weddell seals. Researchers would harass, observe, handle/restrain, weigh, conduct photogrammetry on, sample, mark, and/or attach small instruments to numerous Weddell seals of both sexes and various age classes (see the take table and application for specifics). Crabeater and leopard seals could be harassed incidental to the proposed activities. Dr. Garrott also requests up to one pup and one adult Weddell seal mortality¹ per year. Dr. Garrott would employ various measures to minimize impacts to the pinniped species and also would be required to abide by the National Marine Fisheries Service's (NMFS) standard permit conditions. Montana State University's Institutional Animal Care and Use Committee reviewed and approved the proposed 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

Rebecca J. Lent

¹ Either unintentional or intentional mortality (i.e., euthanasia for humaneness purposes).