



MARINE MAMMAL COMMISSION

5 September 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 Amendment Application No. 18786
(Marine Mammal Health and
Stranding Response Program)

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 amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). The National Marine Fisheries Service (NMFS) Office of Protected Resource's Marine Mammal Health and Stranding Response Program (MMHSRP)¹ is requesting to amend its permit that authorizes it to (1) respond to, rescue, transport, rehabilitate, and release threatened and endangered marine mammals under NMFS's jurisdiction and disentangle marine mammals under NMFS's jurisdiction; (2) conduct research² on marine mammals under NMFS's jurisdiction; and (3) collect, salvage, receive, possess, transfer, import, export, analyze, and curate samples from marine mammals under NMFS's jurisdiction during a five-year period³.

MMHSRP is requesting to amend its permit to clarify certain aspects of the take tables and to add or increase the numbers of takes of certain groups or species of marine mammals during various activities (see the amendment request and take tables for specifics). The research aspects of the permit amendment were reviewed by one of the three NMFS Institutional Animal Care and Use Committees (IACUCs). That IACUC indicated that the original protocols did not need to be revised and an additional approval was not warranted—the other two IACUCs are currently reviewing the amendment request. If deemed necessary, approvals for the revised protocols would be obtained from the other two IACUCs prior to conducting the proposed activities. The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and therefore recommends that NMFS issue the permit amendment, provided that the current permit conditions remain in effect.

¹ Including approximately 145 stranding network partner organizations external to NMFS OPR.

² In support of either an emergency event investigation or baseline health research.

³ Permit 18786 expires 30 June 2020.

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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 initial "R" and a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.,
Executive Director