



MARINE MAMMAL COMMISSION

12 April 2018

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. 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 amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Garrott is seeking to amend his permit to conduct research on Weddell seals in Antarctica—permit 21158 expires on 30 September 2022. 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 are authorized to 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.

Dr. Garrott requested to increase the numbers of takes for various activities (see the take table for details) based on immigration of Weddell seals into the study area and an increase in overall pup production. The requested take increases also are consistent with the Commission's recommendation to review the numbers of authorized takes, considering both the numbers of animals reported to have been taken in previous years and the variability inherent in a population that is growing, and revise them accordingly (see its [15 November 2017 letter](#)). Thus, the Commission recommends that NMFS issue the permit amendment, provided that the current permit conditions remain in effect.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas".

Peter O. Thomas, Ph.D.,
Executive Director