



MARINE MAMMAL COMMISSION

15 March 2019

Dr. Mary Cogliano, 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: Revised Permit Application No. 51164C
(U.S. Geological Survey,
National Wildlife Health Center)

Dear Dr. Cogliano:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced revised permit application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA)¹. The U.S. Geological Survey's National Wildlife Health Center (NWHC) proposes to possess, receive, and/or export samples from northern sea otters, walruses, polar bears, and West Indian manatees during a five-year period—permit MA195274 authorized similar activities.

The purpose of the research is to investigate causes of marine mammal diseases and mortalities. Samples could be obtained from dead-stranded walruses, polar bears, manatees, and sea otters² in the United States. NWHC also requested to obtain samples from live walruses, polar bears, and manatees; however, it is not clear whether those samples would be obtained from live-stranded or free-ranging wild animals. If samples are to be obtained from live-stranded animals, the application should be clarified accordingly³. If samples are to be obtained from free-ranging wild animals, the application should be corrected⁴, and the permit under which the samples are authorized to be collected should be specified. In either case, additional information is needed on how the samples were or would be collected, including animal handling and sampling collection protocols⁵. The Commission recommends that, prior to issuing any permit, FWS require NWHC to specify the source of the live-animal samples that it would obtain and the other necessary information stipulated in the 2017 application instructions as noted herein.

¹ The Commission provided informal comments on NWHC's original application in its [19 December 2018 letter](#). NWHC addressed the deficiencies noted in the Commission's letter and submitted a revised application to the U.S. Fish and Wildlife Service (FWS) consistent with the 2017 application instructions.

² Including complete sea otter carcasses.

³ See item 29(k)(i) in the 2017 application instructions.

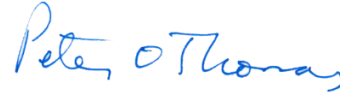
⁴ See item 29(k)(iv) in the 2017 application instructions.

⁵ See item 29(l) in the 2017 application instructions.

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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". The signature is written in a cursive style with a large initial "P" and "T".

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