



MARINE MAMMAL COMMISSION

2 April 2019

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. 22686
(Brookfield Zoo)

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). Brookfield Zoo is requesting to import three female, captive-born common bottlenose dolphins from Dolphin Quest Bermuda for the purpose of public display. The dolphins will be housed at either the Brookfield Zoo in Brookfield, Illinois, or Coral World in the U.S. Virgin Islands. Both facilities (1) are open to the public on a regularly scheduled basis with access that is not limited or restricted other than by charging an admission fee, (2) offer an educational program based on professionally recognized standards, and (3) hold exhibitor's licenses¹ issued by the Animal and Plant Health Inspection Service (APHIS) under the Animal Welfare Act (AWA). In addition, each facility would abide by standards set forth by the International Air Transport Association for transporting the dolphins from Bermuda.

Both APHIS and the Commission have received communications from concerned groups alleging water quality problems at Coral World's new dolphin facility, the Dolphin Education Center. In February 2019, subsequent to receipt of the water quality complaints, APHIS inspected Coral World and approved its dolphin facility for use. Nevertheless, given the concerns raised by others with respect to the Dolphin Education Center, the Commission recommends that the National Marine Fisheries Service not issue the permit until it has consulted further with APHIS to verify current compliance of the facility with all applicable AWA standards and regulations.

¹ Exhibitor License 33-C-0003 and 98-C-0001 have been issued to Brookfield Zoo and Coral World, respectively.

Ms. Jolie Harrison
2 April 2019
Page 2

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 a distinct "O" for the middle name.

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

cc: Dr. Barbara Kohn, APHIS