



MARINE MAMMAL COMMISSION

7 May 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 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 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 (OPR) Marine Mammal Health and Stranding Response Program (MMHSRP) is requesting to amend its permit, which authorizes MMHSRP to (1) respond to, rescue, transport, rehabilitate, and release threatened and endangered marine mammals under NMFS jurisdiction and disentangle marine mammals under NMFS jurisdiction, (2) conduct research¹ on marine mammals under NMFS jurisdiction, and (3) collect, salvage, receive, possess, transfer, import, export, analyze, and curate samples from marine mammals under NMFS jurisdiction during a five-year period. MMHSRP is a statutorily mandated program with three Congressionally directed goals of (1) facilitating the collection and dissemination of reference data on the health and health trends of marine mammals in the wild, (2) correlating the health of marine mammals with available data on physical, chemical, and biological environmental parameters, and (3) coordinating effective responses to unusual mortality events.

MMHSRP is requesting two amendments to its permit. First, it requests to extend the expiration date from 30 June 2020 to 31 December 2021 to give MMHSRP additional time to prepare an updated programmatic environmental impact assessment for its permit renewal. Second, MMHSRP requests 400 additional remote biopsy sampling takes of non-neonate cetaceans of either sex (see the take table and application for specifics). The purpose of the additional takes is to examine the health of common bottlenose dolphins in response to increased contaminants in the Turtle/Brunswick River Estuary as part of a Natural Resource Damage Assessment process resulting from the chronic release of hazardous substances from industrial operations in Brunswick, Georgia.

¹ In support of either an emergency event investigation or baseline health research.

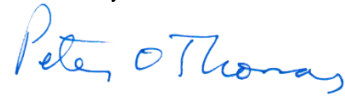
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The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that NMFS issue the permit amendment, contingent on inclusion of the current permit conditions. Kindly contact me if you have 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