



MARINE MAMMAL COMMISSION

19 February 2021

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. 24365
(Paul Ponganis, Ph.D.,
Scripps Institution of Oceanography)

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 request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Ponganis proposes to conduct research on California sea lions in California during a five-year period—permit 19638 authorized similar activities.

Dr. Ponganis proposes to conduct research on California sea lions on San Nicolas Island, California. The purpose of the research is to investigate the role of various physiological responses, oxygen store depletion, and anaerobic metabolism in dive and foraging behavior of California sea lions. Dr. Ponganis would harass, capture, handle, restrain, measure/weigh, administer drugs¹ to, mark², sample³, and/or instrument⁴ up to 15 lactating females per year (see the application and take table for specifics). Dr. Ponganis could also capture, handle, restrain, measure/weigh, and mark⁵ dependent pups. Non-target California sea lions, harbor seals, northern elephant seals, and northern fur seals may be harassed incidentally during the proposed activities. Dr. Ponganis requests up to one mortality⁶ each of a lactating female and her dependent pup per year. He would use various measures to minimize impacts on pinnipeds and would be required to abide by the National Marine Fisheries Service's (NMFS) standard permit conditions. Dr. Ponganis's Institutional Animal Care and Use Committee has reviewed and approved the research protocols.

¹ Including anesthesia drugs and antibiotics.

² With flipper tags.

³ Including blood and whiskers.

⁴ Including VHF transmitters, satellite-linked transmitters, 3D accelerometers⁴, time-depth recorders, PO₂ electrodes and PO₂-ECG recorders, lactate electrodes and recorders, temperature electrodes and recorders, and/or CATS-Cams.

⁵ By clipping fur or attaching a small neoprene or tape patch and flipper tags.

⁶ By either unintentional mortality or intentional mortality (i.e., euthanasia for humaneness purposes).

Ms. Jolie Harrison
19 February 2021
Page 2

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that the National Marine Fisheries Service issue the permit, as requested.

Please contact me if you have any questions regarding 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" in the middle name.

Peter O. Thomas, Ph.D.
Executive Director