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. 23188  
(Daniel Costa, Ph.D.,  
University of California Santa Cruz)

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. Costa is authorized to conduct research on northern elephant seals in California during a five-year period—permit 23188 expires on 30 September 2025. The purpose of the research is to continue a long-term study investigating (1) population growth and status, (2) reproductive strategies, (3) behavioral and physiological adaptations for diving and fasting, (4) general and sensory physiology and metabolism, (5) health and disease, and (6) bioacoustics associated with northern elephant seals. Researchers are authorized to harass, observe, photograph/videotape, capture, handle, restrain, transport/translocate, temporarily hold in captivity, sedate, measure/weigh, sample, mark/tag, conduct procedures on, acoustically record, and attach instruments to or implant instruments in northern elephant seals of either sex and any age class each year.

Dr. Costa has requested to increase the number of takes of juvenile northern elephant seals from 300 to 350. The purpose of the amendment request is to investigate differences in the weaning body condition of seals at the Año Nuevo and Lost Coast colonies. Researchers would harass, observe, photograph/videotape, capture, handle, restrain, sedate, measure/weigh, sample, mark/tag, and/or conduct procedures\(^1\) on up to 50 additional juvenile seals (see the amendment application for specifics). 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 amendment, contingent on inclusion of the current permit conditions.

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\(^1\) Including conducting ultrasound on or administering Evan’s blue dye and/or tritiated water and collecting serial blood samples.
Please contact me if you have any questions regarding the Commission’s recommendation.

Sincerely,

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