



MARINE MAMMAL COMMISSION

9 July 2013

Mr. Timothy J. Van Norman
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
4401 North Fairfax Drive
Arlington, VA 22203

Re: Permit Application No. 19806A
(Thomas Postel)

Dear Mr. Van Norman:

The Marine Mammal 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. Mr. Postel proposes to renew his permit to film manatees during a five-year period.

RECOMMENDATION

The Marine Mammal Commission recommends that the Fish and Wildlife Service issue the permit, as requested.

RATIONALE

Mr. Postel is requesting authorization to take by Level B harassment up to 10 West Indian manatees per day during filming activities that would occur in Florida. The purpose is to document natural behavior of manatees throughout Florida, including in various wildlife refuges, state parks, and protected areas. The footage would be used in wildlife documentaries or for educational purposes. The Fish and Wildlife Service and Crystal River National Wildlife Refuge recently used Mr. Postel's manatee footage on their website. Mr. Postel and his co-investigator, Mr. Robert Giguere, have videotaped and produced wildlife documentaries and educational videos throughout the world, including numerous documentaries and videos on manatees.

Mr. Postel would conduct the proposed filming activities daily from November through March of each year. Using a small skiff, he would approach the manatees no closer than 6 m. He would turn the engine off and allow the manatees to approach the vessel. To film their natural behaviors underwater, Mr. Postel and Mr. Giguere would enter the water and allow the manatees to approach them. They could snorkel in shallow water depths (0–9 m) or scuba dive in deep water depths (> 3 m) to obtain the footage. Manatees would be filmed for up to 10 minutes per session and for no more than three sessions per day. If a manatee becomes curious and closely approaches the filmmakers, they would exit the area and then return approximately 30 minutes later to capture additional footage.

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Mr. Postel does not anticipate that any manatee would be injured or disturbed by the various filming activities. Nevertheless, he would cease filming activities if a manatee appears to be unduly disturbed by the activity. In addition, Mr. Postel would obtain the appropriate authorizations from the various wildlife refuges, state parks, and protected areas prior to conducting the proposed filming activities.

The Commission supports the filming of marine mammals, including manatees. Those films can be an important means of educating the public about manatees, their natural history, and the value of conserving them. Because of the precautionary manner in which Mr. Postel would conduct the filming activities, the Marine Mammal Commission recommends that the Fish and Wildlife Service issue the permit, as requested.

The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the Marine Mammal Protection Act.

The Commission appreciates the opportunity to comment on this permit application. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director