



MARINE MAMMAL COMMISSION

21 July 2014

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. 17115
(Jamie Lloyd-Smith, Ph.D.,
University of California, Los Angeles)

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). Dr. Lloyd-Smith is seeking to amend permit 17115 that authorizes him to conduct research on California sea lions in California. The current permit expires on 30 September 2017.

Dr. Lloyd-Smith is authorized to harass, capture, handle, restrain, sedate, measure, mark/tag, and sample California sea lions at Año Nuevo Island, in Monterey Bay, and at San Nicolas Island. Dr. Lloyd-Smith is authorized to conduct the specified activities on yearlings, juveniles, and subadults of either sex. In addition, stranded sea lions are sampled under The Marine Mammal Center's (TMMC) stranding agreement. The purposes are to (1) investigate exposure to and shedding of leptospira in wild and stranded California sea lions and (2) understand the mechanisms underlying recurrent and deadly epizootics of leptospirosis in sea lions.

Dr. Lloyd-Smith is requesting multiple changes to its permit, including—

- (1) expanding the two sampling sites in central California to include all coastal California counties and offshore islands except San Nicolas Island, thereby increasing the number of directed takes of California sea lions by 40 per year and the incidental takes of California sea lions by 2,000 per year;
- (2) adding the authorized activities for up to 20 8- to 9-month old California sea lion pups during the “non-outbreak” season (March through May);
- (3) expanding the “non-outbreak” season to any time of year excluding peak pupping seasons;
- (4) adding a water approach method (boat and/or swimmers) to capture sea lions in nets (hoop, clam shell, seine, or salmon) and the use of injectable sedation and reversal drugs;
- (5) increasing the number of incidental takes of California sea lions by 4,000 at San Nicolas Island;
- (6) adding the collection of discharge and swabs from various sites (e.g., nares, mouth, eyes, rectum, vagina, wound) to assess the presence and prevalence of infectious diseases; and

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- (7) adding the taking of up to 10 Steller sea lions and 150 northern fur seals per year incidental to the authorized activities.

Dr. Lloyd-Smith is in the process of submitting the new research protocols to his Institutional Animal Care and Use Committee (IACUC) for its review and approval. He will forward his IACUC approval to NMFS once issued. The Commission believes that the activities for which Dr. Lloyd-Smith has requested a permit amendment are consistent with the purposes and policies of the MMPA. Therefore, the Commission recommends that NMFS issue the permit amendment, provided that the current permit conditions remain in effect.

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

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director