



MARINE MAMMAL COMMISSION

30 March 2015

Ms. Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, Maryland 20910

Re: Permit Application No. 17967
(Minnesota Zoological Garden)

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). Minnesota Zoological Garden (Minnesota Zoo) is seeking authorization to conduct research activities on captive Hawaiian monk seals¹ during a five-year period.

Minnesota Zoo is requesting authorization to conduct research on up to eight non-releasable female Hawaiian monk seals of any age. SeaWorld San Antonio currently has five female monk seals that were rescued for rehabilitation purposes under section 109(h) of the MMPA in 1995, brought into captivity, and then deemed non-releasable by the National Marine Fisheries Service (NMFS). Those five monk seals would be transported via truck to Minnesota Zoo where they would be permanently maintained for the remainder of their lives. Minnesota Zoo would maintain in permanent captivity additional monk seals that are deemed non-releasable by NMFS under section 109(h) of the MMPA and transported to the Zoo. The purpose of the proposed research is to investigate (1) vaccine efficacy associated with previously administered vaccines for canine and phocine distemper and West Nile virus² and (2) the use of novel sedatives and reversal agents to inform possible use in the wild population. Research would occur during routine health assessments and medical treatments under veterinary discretion. Although authorized under MMHSRP's permit, the development and testing of in-water capture and restraint techniques that ultimately would be used in the wild also could occur at Minnesota Zoo.

Because the monk seals will be maintained at Minnesota Zoo for the remainder of their lives, at some point those seals will become ill or their health will deteriorate with age. Accordingly, up to eight monk seal mortalities, either intentionally via euthanasia or unintentionally, would be authorized under this permit. A complete necropsy would be performed on any dead seal. Minnesota Zoo's holds a current exhibitor's license issued by the U.S. Department of Agriculture

¹ Previous research activities were authorized under permits 116-1786 and 16124 issued to SeaWorld.

² Any additional vaccinations would be administered under research permits issued to NMFS's Pacific Islands Fisheries Science Center or the Marine Mammal Health and Stranding Response Program (MMHSRP).

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and the Zoo's Institutional Care and Use Committee would review and approve the research protocols prior to the activities being conducted.

The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA and therefore recommends that NMFS issue the permit, as requested. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director