



# MARINE MAMMAL COMMISSION

22 October 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. 17152  
(Point Blue Conservation Science)

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). Point Blue Conservation Science (Point Blue) is seeking to amend permit 17152 that authorizes it to conduct research on pinnipeds in California. The current permit expires on 30 November 2017.

Point Blue is authorized to conduct research on pinnipeds from Año Nuevo Island to the Russian River, California. The purpose of the research is to investigate (1) abundance and distribution, (2) survival and reproductive success, (3) movement patterns and habitat use, (4) foraging ecology and fisheries interactions, (5) disease and health, and (6) effects of human disturbance on pinnipeds. Authorized activities include harassing, capturing, handling, restraining, administering drugs to, measuring, weighing, marking/tagging, sampling, and attaching instruments to various numbers of pinnipeds. Point Blue is authorized to conduct the specified activities on individuals of various age classes and either sex.

Point Blue is requesting multiple changes to its permit, including—

1. increasing the number of California sea lion Level B harassment takes by 1,000 sea lions per year at the South Farallon Islands (SFI) based on the increasing number and distribution of California sea lions on SFI;
2. amending the northern fur seal Level B harassment takes from 75 seals taken twice per year to 250 seals taken once per year at SFI based on the increasing number of fur seals on SFI;
3. adding Level B harassment and photography of up to 250 Steller sea lions per year at SFI to account for Steller sea lion takes that previously were authorized under an incidental harassment authorization rather than a research permit; and
4. adding scat collection for California sea lions at SFI<sup>1</sup> to assess their foraging ecology.

Point Blue would avoid harassing lactating females and their pups and would continue to take all possible efforts to minimize any potential pinniped disturbance. Therefore, the Commission believes

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<sup>1</sup> Which would occur when other authorized activities or surveys already are occurring.

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that the activities for which Point Blue has requested a permit amendment are consistent with the purposes and policies of the MMPA and recommends that NMFS issue the amendment, as requested. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a large initial "R" and a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.  
Executive Director