



MARINE MAMMAL COMMISSION

1 July 2014

Ms. Jolie Harrison, Acting 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. 13430
(National Marine Mammal Laboratory)

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). The National Marine Mammal Laboratory (NMML) is seeking to amend permit 13430 that authorizes it to conduct research on pinnipeds in Washington and Oregon. The current permit expires on 31 January 2015.

NMML's research focuses on pinniped (1) abundance and distribution, (2) health and disease, (3) demographic parameters, (4) genetics, and (5) foraging ecology. Its activities include harassing, capturing, handling, restraining, administering drugs to, measuring, weighing, marking/tagging, sampling, conducting playback experiments on, and attaching instruments to various numbers of pinnipeds. NMML is authorized to conduct the specified activities on individuals of various age classes and either sex.

NMML is requesting two changes to its permit that include—

- (1) adding the use of midazolam and its reversal agent, flumazenil, for sedating harbor seals and California sea lions in lieu of valium at the discretion of the attending veterinarian; and
- (2) extending the end date of the permit to 31 January 2020.

NMML's Institutional Animal Care and Use Committee has reviewed and approved the research protocols. In addition, the Commission understands that the National Marine Fisheries Service (NMFS) would issue the permit amendment for five years from the date of issuance, which is consistent with its implementing regulations at 50 C.F.R. §216.35. Therefore, the Commission recommends that NMFS issue the permit amendment, provided that the current permit conditions remain in effect.

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

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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,

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