



# MARINE MAMMAL COMMISSION

14 November 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. 11219B  
(Alaska SeaLife Center)

Dear Mr. Van Norman:

The Marine Mammal Commission (the MMC), 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 Alaska SeaLife Center (ASLC) is seeking to change the authorization under which non-releasable rehabilitated walrus are being maintained by the facility. The walrus, which currently are being maintained under section 109(h) of the MMPA, would be transferred to a public display permit.

## **RECOMMENDATION**

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

## **RATIONALE**

ASLC is requesting that the authorization under which rehabilitated non-releasable walrus are maintained at the facility be changed from a letter of authorization under section 109(h) to a public display permit for up to 12 walrus per year. The stranded walrus primarily would be calves or yearlings but could be of any age class or either sex. Once under the public display permit, ASLC could transfer the walrus to other long-term care facilities within the United States. It would not export the walrus to foreign facilities.

ASLC would remove stranded walrus from the wild and would rehabilitate them under its letter of authorization, which allows it to engage in activities under 109(h) of the MMPA. After rehabilitation, some walrus are deemed non-releasable. Section 104(c)(7) of the MMPA provides a mechanism for issuing public display permits to qualified facilities for the long-term care of such animals. Once a permit has been issued to a domestic facility, the animals may be transferred to other U.S. facilities in accordance with section 104(c)(2)(B) of the MMPA.

Walrus would be implanted with a PIT tag prior to transport to another facility. They also would be medically stable prior to transport. Transport to another facility could be either by ground or aircraft and would comply with Animal Plant and Health Inspection Service standards,

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Convention on International Trade in Endangered Species of Wild Fauna and Flora guidelines, and International Air Transport Association regulations.

ASLC (1) is open to the public on a regularly scheduled basis with access that is not limited or restricted other than by charging an admission fee, (2) offers an educational program based on professionally recognized standards, and (3) holds Exhibitor's License 96-C-0024, issued by the Department of Agriculture under the Animal Welfare Act. Therefore, ASLC meets the issuance requirements for a public display permit under the MMPA. As such, the MMC recommends that the Fish and Wildlife Service issue the permit, as requested.

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

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