

MARINE MAMMAL COMMISSION
4340 East-West Highway, Room 700
Bethesda, MD 20814-4447

29 May 2009

Mr. P. Michael Payne, Chief
Permits, Conservation, and Education Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Application No. 14483
(Ocean World)

Dear Mr. Payne:

The Marine Mammal 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.

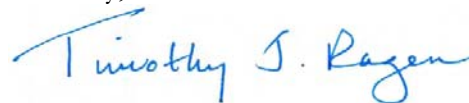
The applicant is requesting authorization to import three captive-born female California sea lions (a one-year-old and two animals yet to be born) from Zoo Tiergarten Nuremberg, Nuremberg, Germany, for purposes of public display. The applicant is requesting that the permit be made effective for three years to allow for importation of the animals.

RECOMMENDATION

The activities for which a permit is being sought appear to meet the Marine Mammal Protection Act's requirements assuming that the Service determines that the applicant's program for education or conservation purposes meets the recognized standards of the public display community. However, the Commission questions whether facilities should be encouraged to breed and/or import California sea lions for public display purposes in lieu of securing animals from alternative sources, such as stranded animals or those that otherwise might be euthanized because of impacts to salmonid fishery stocks. Captive-born sea lions may be better for certain purposes (e.g., certain types of research) as they may adapt better to captive conditions. However, it is not clear that the animals to be imported (some of which are as yet unborn) provide such benefits. Therefore, the Marine Mammal Commission recommends that the Service obtain additional information as to why sea lions already in captivity—and that otherwise might be euthanized—would not suit Ocean World's needs.

Please contact me if you have any questions concerning this recommendation and request.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director

cc: Barbara Kohn, D.V.M.