



# MARINE MAMMAL COMMISSION

29 May 2012

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

Re: Request for Amendment, Permit No. 15748  
(Alaska SeaLife Center)

Dear Mr. Payne:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act. Permit 15748 authorizes the Alaska SeaLife Center to conduct research on Weddell seals in Antarctica. The current permit expires on 30 August 2015. The Center is requesting numerous amendments to its current permit.

## RECOMMENDATIONS

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit amendment, provided that—

- the conditions contained in the current permit remain in effect; and
- it advises the Center of the need to have its Institutional Animal Care and Use Committee (IACUC) review and approve the revised research protocols prior to implementing them in the field.

## RATIONALE

Permit No. 15748 authorizes the permit holder to harass, capture, restrain, sedate, measure, sample, conduct ultrasound on, perform photogrammetry on, and instrument Weddell seals in McMurdo Sound, Antarctica. It also authorizes the unintentional deaths of up to two Weddell seals per year. The purpose of the research is to quantify thermoregulatory costs to Weddell seals under ambient air and water conditions.

The Center requests that the permit be amended to authorize additional research activities that include—

- increasing the number of weaned pups/juvenile seals of either sex that can be captured, restrained, sampled, and instrumented from 20 to 35 during the duration of the permit to compare energetic needs of weaned pups and juveniles;

Mr. P. Michael Payne  
29 May 2011  
Page 2

- increasing the number of times an individual (i.e., weaned pups/juveniles and adult females) can be captured, restrained, and sedated from two to three times to adjust or replace failed or loose tag equipment to prevent tag loss or failure;
- collecting one each of nasal, oral, and rectal swabs to study Influenza A;
- spraying lidocaine on the adenoids to facilitate laryngoscope insertion;
- analyzing blood samples for stable isotope signatures to investigate changes in trophic ecology from the 1900s and now;
- increasing the number of co-investigators by four;
- taking photographs and videos of research activities for use during educational events and on websites of the primary investigator and co-investigators; and
- conducting full post-mortem exams (i.e., collecting blood and tissue samples for import into the United States) if any seal is unintentionally killed during the research activities.

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit amendment, provided that the conditions contained in the current permit remain in effect.

It is unclear if the Center's IACUC has reviewed and approved the revised research protocols. To address that concern, the Marine Mammal Commission recommends that the National Marine Fisheries Service advise the Center of the need to have its IACUC review and approve the revised research protocols prior to implementing them in the field.

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

Please contact me if you have any questions concerning the Commission's recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Timothy J. Ragen, Ph.D.  
Executive Director