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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

16th April 2007

Re: 72 FR 7420 Applications for Steller Sea Lion and Northern Fur Seal Research Permits

Dear Mr. Payne,

I would like to recommend that NMFS Office of Protected Resources grant permits for the various observational research, especially brand re-sighting efforts, that are proposed in the numerous permit applications listed in 72 FR 7420. I also recommend granting permits for efforts to disentangle animals from fishing gear and other debris, and for the disturbance associated with that activity.

Additional disturbance should be justified in terms of meeting a conservation goal and/or minimised where possible given the statuses of these populations. For example, scat collection outside breeding season under proposed permit 1049-1886 has a minimal disturbance and is justified well in the application. Consequently, I recommend permitting such research.

Invasive work, including involving short-term captivity, should be highly justified in terms of conservation goals, limited to the minimum necessary, and the methodology should be well structured and appropriate to a well-defined hypothesis. A good example of this is found in permit application 715-1884, which I recommend granting. However, such justification, well-designed methodology, and clear hypotheses are not provided (and woefully lacking in many cases) in several other applications, including, but not limited to, 782-1889 and 881-1890. One major concern is that subjecting an individual to a number of procedures and involving them in a number of studies will devalue (in some cases significantly) the value of the research for each study, especially when the effects of each activity are not known, as was clearly stated for the majority of activities included in the related DEIS. Consequently, I recommend **not** permitting research beyond merely observational work in those cases.

I do **not** recommend permitting bringing animals into permanent captivity in general, especially in populations in decline or holding stable, as this removes individuals from the population and clearly has a detrimental effect on the population. However, I **do**

recommend granting the request under permit 715-1883, as this is very well justified and involves only a small number of animals. Furthermore, the methodology appears to be very well thought out and very appropriate to the well-defined hypothesis and research objectives. These are, in turn, addressing some crucial information needs, such as the efficacy and appropriateness of field techniques that remains untested in the species. The results of this work have the potential to confirm the assumptions made about the techniques or invalidate some of those assumptions and lead to a re-think of previous work. It is also possible that this work might identify techniques that are unnecessarily invasive, as there are less invasive ways that might be just as accurate at obtaining comparable data, which would lead to a long-term benefit to the population in and of itself.

I also recommend circulating the applications by Professor. Kate Wynn and the North Pacific Universities Marine Mammal Research Consortium to the other applicants, as several of them could learn a great deal from these examples of well-written applications.

Many thanks and best regards,

Andrew Wright