



MARINE MAMMAL COMMISSION

11 June 2013

Ms. Nadene G. Kennedy
Permit Office, Room 755
Office of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Ms. Kennedy:

On 3 June 2013 the National Science Foundation published a notice (78 Fed. Reg. 33115) requesting comments on a permit application from Dr. Jennifer Burns, University of Alaska Anchorage. Dr. Burns is seeking authorization under the Antarctic Conservation Act of 1978 to conduct research on Weddell seals at Cape Evans, Backdoor Bay, and Cape Royds, Antarctica. The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the permit request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act and Antarctic Conservation Act and offers the following recommendation.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Science Foundation defer issuance of the requested permit under the Antarctic Conservation Act until the National Marine Fisheries Service has issued a permit under the Marine Mammal Protection Act authorizing the proposed activities.

RATIONALE

Permit 17411, to be issued by the National Marine Fisheries Service under the Marine Mammal Protection Act, will authorize Dr. Burns to conduct research on Weddell seals in Antarctica. The purpose of the research is to investigate (1) the intrinsic and extrinsic factors that determine molt phenology, (2) the effects of body condition and molt status on current pregnancy and future parturition rates, and (3) the effects of food availability on molt timing and future reproductive success. Dr. Burns would harass, capture, handle, sedate, measure, weigh, sample, conduct photogrammetry and ultrasound on (to assess body condition), mark/tag, and attach instruments to 24 adult female Weddell seals. She could recapture and conduct health assessments on all 24 individuals during a second recapture but would only conduct ultrasound on 8 individuals that would be captured a third time. During one of those recaptures, the instruments would be retrieved. If an animal is not captured during the molt, the instrument would be removed during recapture in the next year. In total, Dr. Burns is requesting a maximum of 80 takes of adult females each year. She also would harass, capture, handle, measure, weigh, and flipper tag up to 24 pups per year. Dr. Burns and her colleagues would approach up to 1,800 previously tagged individuals during biweekly ground surveys to read their tags and assess molt status. During those surveys, she also would collect samples from up to 10 dead Weddell seals per year. All samples collected during the field season would be imported to the United States.

Ms. Nadene Kennedy
11 June 2013
Page 2

The Commission has commented on Dr. Burns's related application to the National Marine Fisheries Service (enclosed) and recommended issuance of that permit. Nonetheless, because the Service has yet to issue permit 17411, the Marine Mammal Commission recommends that the National Science Foundation defer issuance of the requested permit under the Antarctic Conservation Act until the National Marine Fisheries Service has issued a permit under the Marine Mammal Protection Act authorizing the proposed activities. Otherwise, the Commission believes the permit application to the Foundation should be approved.

The Commission believes that the activities in the permit application are consistent with the purposes and policies of the Marine Mammal Protection and Antarctic Conservation Acts.

The Commission appreciates the opportunity to review this permit application. Please feel free to contact me if you have any questions regarding the Commission's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director

Enclosure

Cc: Mr. P. Michael Payne