

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

5 June 2009

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

Dear Ms. Kennedy:

By notice in the *Federal Register* dated 1 May 2009 (74 Fed. Reg. 20349), your office requested comments on a permit application from Stacy Kim seeking authorization under the Antarctic Conservation Act of 1978 to launch a remotely operated vehicle under the Ross Ice Shelf at the northwest end of White Island.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Science Foundation deny the requested authorization unless the applicant can show (1) that there is an ecological component to the proposed research that would further our understanding of the White Island Weddell seal population or that would contribute to its conservation, or (2) absent such a showing, that the proposed research cannot be accomplished at a location other than White Island and that the research would not be detrimental to the seal population.

RATIONALE

White Island has been designated as a Site of Special Scientific Importance (SSSI No. 18) by the Scientific Committee on Antarctic Research. The basis for that designation was to protect the “unusual breeding population of Weddell seals...which is the most southerly known, and which has been physically isolated from other populations by advance of the McMurdo Ice Shelf and Ross Ice Shelf.” This population numbers about 25 to 30 animals. According to the management plan adopted for SSSI No. 18 (enclosed), this “population is considered to have exceptional scientific value because of its period of physical isolation from interaction with other seals, thought to be perhaps up to several hundred years, and investigations are being undertaken of the extent to which the group may be considered a genetically distinct population.”

The management plan for White Island includes objectives to (1) avoid degradation of, or substantial risk to, the values of the area by preventing unnecessary human disturbance, (2) allow scientific research on the ecosystem, in particular on the Weddell seals, while ensuring protection from excessive disturbance or other possible scientific impacts, and (3) allow other scientific research provided it will not jeopardize the values of the area. The management plan also specifies various permit conditions designed to further these objectives by restricting access to the area except in limited circumstances.

Ms. Nadine G. Kennedy
5 June 2009
Page 2

It is unclear whether the applicant's proposal to conduct research at White Island meets the standards set forth in the management plan for allowable research (e.g., is there an ecological component to the proposed research that would further our understanding of the White Island Weddell seal population or that would contribute to its conservation?). Similarly, it is unclear why the proposed research cannot be accomplished at a location other than White Island.

Based on these uncertainties, the Marine Mammal Commission recommends that the National Science Foundation deny the requested authorization unless the applicant can show (1) that there is an ecological component to the proposed research that would further our understanding of the White Island Weddell seal population or that would contribute to its conservation, or (2) absent such a showing, that the proposed research cannot be accomplished at a location other than White Island and that the research would not be detrimental to the seal population.

Please contact me if you or your staff has any questions about our recommendation and comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy J. Ragen" followed by a flourish and the word "for".

Timothy J. Ragen, Ph.D.
Executive Director

Enclosure

cc: Mr. P. Michael Payne