



MARINE MAMMAL COMMISSION

26 September 2016

Dr. Nature McGinn, ACA Permit Officer
Permit Office, Room 755
Division of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Dr. McGinn:

On 9 September 2016, the National Science Foundation (NSF) published a notice (81 Fed. Reg. 62542) requesting comments on a permit application from Dr. George Watters, Southwest Fisheries Science Center. Dr. Watters is seeking authorization under the Antarctic Conservation Act (the ACA) to conduct research on pinnipeds in Antarctica and the South Shetland Islands during a five-year period. The Marine Mammal Commission (the 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 (the MMPA) and the ACA.

Dr. Watters proposes to conduct research on six species of pinnipeds on the Antarctic Peninsula and the South Shetland Islands. Researchers would harass, observe, capture, handle/restrain, release, sedate, weigh/measure, mark/sample¹, and instrument numerous individuals of either sex and various age classes of pinnipeds² each year (see the Take Table 1). The purpose of the research is to investigate abundance, distribution, population dynamics, reproductive success, energetics, and foraging ecology of pinnipeds.

MMPA permit 20599, to be issued by the National Marine Fisheries Service (NMFS), would authorize the proposed activities. The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and ACA and recommends that NSF issue the ACA permit, provided that it includes authorization only for the numbers of specific types of taking authorized under NMFS permit 20599 when issued. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent".

Rebecca J. Lent, Ph.D.
Executive Director

cc: Amy Sloan, NMFS

¹ Including the import of samples into the United States.

² Including unintentional mortalities or intentional mortalities (i.e., euthanasia for humaneness purposes).