



MARINE MAMMAL COMMISSION

3 October 2017

Dr. Nature McGinn, ACA Permit Officer
Permit Office, Room 755
Division of Polar Programs
National Science Foundation
2415 Eisenhower Avenue
Alexandria, Virginia 22314

Dear Dr. McGinn:

On 14 September 2017 the National Science Foundation (NSF) published a notice (82 Fed. Reg. 43258) requesting comments on a permit application from Dr. Linnea Pearson, California Polytechnic State University. Dr. Pearson is seeking authorization under the Antarctic Conservation Act (the ACA) to conduct research on Weddell seals in Antarctica. 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. Pearson proposes to conduct research on Weddell seals in Antarctica from 2017 to 2021. The objectives of the research are to study thermoregulatory strategies and diving capabilities of Weddell seal pups. Dr. Pearson would harass, capture, handle, restrain, measure/weigh, sedate, mark, sample, conduct procedures on, and/or attach instruments to Weddell seals (see the take table). She also would conduct ground-based surveys and collect samples from dead seals. All samples would be imported into the United States. Dr. Pearson requests up to two pup mortalities¹ per year, not to exceed three mortalities during the permit duration. The research activities would be authorized under permit 21006 that has yet to be issued by the National Marine Fisheries Service (NMFS). 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, contingent on NMFS issuing permit 21006 that would authorize Dr. Pearson's proposed activities and would contain any relevant conditions for which Dr. Pearson and colleagues must abide.

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 Either unintentional or intentional mortality (i.e., euthanasia for humaneness purposes).