



# 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. Jay Rotella, Montana State University. Dr. Rotella 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. Rotella proposes to conduct research on Weddell seals<sup>1</sup> in Antarctica from 2017 to 2021. The objectives of the research are to evaluate how temporal variation in the marine environment affects individual life histories and population dynamics of Weddell seals. Researchers would harass, observe, handle/restrain, weigh, conduct photogrammetry on, sample, mark, and/or attach small instruments to Weddell seals (see the take table). He also would conduct ground-based surveys and collect samples from dead seals. All samples would be imported into the United States. Dr. Rotella requests up to one pup and one adult Weddell seal mortality<sup>2</sup> per year. The research activities would be authorized under permit 21158 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 21158 that would authorize Dr. Rotella's proposed activities.

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

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<sup>1</sup> Crabeater and leopard seals could be harassed incidental to the proposed activities.

<sup>2</sup> Either unintentional or intentional mortality (i.e., euthanasia for humaneness purposes).