



# MARINE MAMMAL COMMISSION

20 February 2018

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 12 February 2018, the National Science Foundation (NSF) published a notice (83 Fed. Reg. 6053) requesting comments on a permit modification application under the Antarctic Conservation Act (the ACA) from Dr. Ari Friedlaender, University of California Santa Cruz. 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. Friedlaender is authorized to harass, observe, photograph, biopsy sample, and instrument four cetacean species in Antarctica through 31 December 2018. The purpose of the research is to determine stock structure and investigate feeding ecology of cetaceans in Antarctica. For consistency with the activities authorized under permit 14809 issued by the National Marine Fisheries Service, Dr. Friedlaender proposes to (1) increase the numbers of authorized takes for the four cetacean species and (2) add takes of southern right whales under his ACA permit (see the take table)<sup>1</sup>. 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 modification.

Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas".

Peter O. Thomas, Ph.D.,  
Executive Director

cc: Amy Sloan, National Marine Fisheries Service

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<sup>1</sup> The Commission informally noted that the photography takes were not increased in a similar manner as the other types of takes. NSF indicated that the photography takes would be increased accordingly in the final ACA permit modification.