



MARINE MAMMAL COMMISSION

6 March 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 4 December 2017, the National Science Foundation (NSF) published a notice (82 Fed. Reg. 57301) requesting comments on a permit application from Dr. Daniel Costa, University of California Santa Cruz. Dr. Costa is seeking authorization under the Antarctic Conservation Act (the ACA) to conduct research on pinnipeds 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. Costa proposes to conduct research primarily on leopard seals¹ in Antarctica from 2018 to 2020. The objectives are to investigate foraging behavior, habitat utilization, and physiological parameters of an apex predator in a changing environment. Researchers would harass, observe, sedate/anesthetize, handle/restrain, weigh/measure, conduct various procedures on, sample, mark, and/or attach instruments to numerous individuals of various pinniped species (see the take table). Dr. Costa would be authorized for up to four mortalities² of each species per year. He also could collect samples from dead pinnipeds. All samples would be imported into the United States. Dr. Costa's research activities currently are authorized under permit 19439 issued by the National Marine Fisheries Service. 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, as requested. 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

¹ But could conduct the proposed activities on Antarctic fur seals, crabeater seals, southern elephant seals, Ross seals, and Weddell seals as well.

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