



MARINE MAMMAL COMMISSION

3 February 2021

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 25 January 2021, the National Science Foundation (NSF) published a notice (86 Fed. Reg. 6921) requesting comments on a permit application from Dr. Daniel Costa, University of California Santa Cruz. Dr. Costa is seeking to renew his 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 2021 to 2023. 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 either sex and any age class of the 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 19439³ 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, contingent on NMFS issuing a permit to Dr. Costa when his current authorization under the MMPA expires.

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

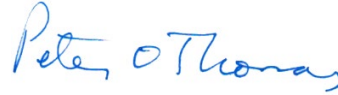
² Either unintentional or intentional mortality (i.e., euthanasia for humaneness purposes).

³ Which expires 1 October 2021.

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The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and ACA. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



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

cc: Amy Sloan, National Marine Fisheries Service