



MARINE MAMMAL COMMISSION

2 December 2013

Ms. Adrian Dahood
Permit Office, Room 755
Office of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Ms. Dahood:

On 21 November 2013 the National Science Foundation (NSF) published a notice (78 Fed. Reg. 70075) requesting comments on a permit application from Dr. Paul Koch, University of California, Santa Cruz. Dr. Koch is seeking authorization under the Antarctic Conservation Act (the ACA) to import into the United States mummified remains from four species of seals collected in Antarctica. Dr. Koch was issued a similar permit under the ACA for the previous summer field season. 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 and offers the following recommendation.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Science Foundation issue the permit, as requested.

BACKGROUND

Dr. Koch proposes to collect bone, fur, and skin samples from up to 75 each of crabeater, southern elephant, Weddell, and leopard seals from Antarctica from December 2013 to May 2014. Dr. Koch would collect the samples from mummified seal remains in the McMurdo Dry Valleys and Society Range regions and adjacent coastlines. The purpose of the research is to investigate the interactions between marine mammal species and the changing climate and environmental conditions during the Holocene. Dr. Koch would import the samples into the United States to conduct radiocarbon, stable isotope, and genetic analyses.

RATIONALE

The National Marine Fisheries Service has indicated that the samples qualify as pre-Act parts, and therefore the import prohibitions under the MMPA do not apply. Further, Dr. Koch would obtain the relevant authorization from the U.S. Fish and Wildlife Service under the Convention on International Trade in Endangered Species of Wild Fauna and Flora prior to importing the samples.

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The Commission believes that the proposed research is useful for investigating the effects of climate change on marine mammals and recommends that NSF issue the permit, as requested.

The Commission believes that the activities in the permit application are consistent with the purposes and policies of the MMPA and ACA.

The Commission appreciates the opportunity to comment on this permit amendment application. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director