



MARINE MAMMAL COMMISSION

16 July 2014

Ms. Li Ling Hamady, Permit Officer
Permit Office, Room 755
Office of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Ms. Hamady:

On 1 July 2014 the National Science Foundation (NSF) published a notice (79 Fed. Reg. 37779) requesting comments on a permit application from Dr. Terrie Williams of the University of California, Santa Cruz. Dr. Williams 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.

Permit 18691, to be issued to Dr. Williams under the MMPA, would authorize her to conduct research on Weddell seals in McMurdo Sound during a five-year period¹. The purpose of the research is to investigate navigation, orientation, and sensory modalities in Weddell seals. Dr. Williams would harass, capture², handle, restrain, transport, sedate, measure, weigh, sample, conduct procedures on (i.e., ultrasound and metabolic chamber studies), and mark/tag up to 36 adult Weddell seals during the study period. She also would instrument and relocate up to 24 of those seals. Dr. Williams could harass up to 15 adult and 5 juvenile Weddell seals per year incidental to the proposed activities. In addition, Permit 18691 would authorize up to two unintentional mortalities per year³ and the collection of tissue and skeletal samples from up to five Weddell seal carcasses per year to be imported into the United States. Dr. Williams did not include those two types of takes in her ACA application but presumably would want authorization for them. Therefore, the Commission recommends that NSF issue the ACA permit, consistent with the timeframe, activities, and numbers of takes authorized under Dr. Williams' MMPA permit.

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

¹ Dr. Williams requested that the ACA authorization be valid from September 2014 until December 2017, which may have been an oversight.

² Dr. Williams would not capture pregnant and/or lactating adult females intentionally.

³ Dr. Williams would conduct a necropsy on any animal that dies during the proposed activities.

Ms. Li Ling Hamady
16 July 2014
Page 2

The Commission appreciates the opportunity to comment on this permit application.
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". The signature is written in a cursive style with a large initial 'R' and a distinct 'L'.

Rebecca J. Lent, Ph.D.
Executive Director

Cc: Jolie Harrison, National Marine Fisheries Service