



MARINE MAMMAL COMMISSION

25 June 2012

Ms. Nadene G. Kennedy
Permit Office, Room 755
Office of Polar Programs
National Science Foundation
4201 Wilson Boulevard
Arlington, VA 22230

Dear Ms. Kennedy:

On 13 June 2012 the National Science Foundation published a notice (77 Fed. Reg. 35431) requesting comments on a permit application from Robert Garrott, Ph.D., Montana State University. Dr. Garrott is seeking authorization under the Antarctic Conservation Act of 1978 to conduct research on Weddell seals at Cape Evans, Backdoor Bay, Hut Point, Cape Royds, Terra Nova Bay, and northwest White Island, Antarctica. The Marine Mammal 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 and Antarctic Conservation Act and offers the following recommendation.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Science Foundation defer issuance of the requested permit under the Antarctic Conservation Act until the National Marine Fisheries Service has issued a permit under the Marine Mammal Protection Act authorizing the proposed activities.

RATIONALE

Permit 17236, to be issued by the National Marine Fisheries Service under the Marine Mammal Protection Act, will authorize Dr. Garrott to conduct research on Weddell seals in Antarctica under that Act. The purpose of the research is to continue a long-term study (since 1968) to evaluate the effects of environmental variability and individual heterogeneity on population dynamics of Weddell seals. Dr. Garrott would capture, handle, restrain, weigh, sample (skin) and mark with flipper tags 425 adults (300 females and 125 males) and 700 newborn pups of either sex per year. Dr. Garrott and his colleagues would approach up to 2,000 tagged individuals during weekly ground surveys to read their tags. During those surveys, he and his colleagues also would collect whiskers from up to 10 dead Weddell seals to be used for genetic and stable isotope analyses. All samples collected during the field season would be imported to the United States.

Dr. Garrott plans to enter northwest White Island twice annually to census and tag seals in that isolated colony. He and colleagues have been conducting research at White Island for many years and have been the only researchers allowed to enter that specially protected area to study Weddell seals. They also would enter the specially protected areas of Cape Evans, Backdoor Bay, Hut Point, Cape Royds, and Terra Nova Bay if any of the tagged seals haul out in those areas.

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The Commission believes that it is vital to continue this long-term study. It has commented on Dr. Garrott's related application to the National Marine Fisheries Service (enclosed). It recommended issuance of that permit and does not know of any reason that the Service would not do so. Nonetheless, because the Service has yet to issue permit 17236, the Marine Mammal Commission recommends that the National Science Foundation defer issuance of the requested permit under the Antarctic Conservation Act until the National Marine Fisheries Service has issued a permit under the Marine Mammal Protection Act authorizing the proposed activities. Otherwise, the Commission believes the permit application to the Foundation should be approved.

The Commission believes that the activities in the permit application are consistent with the purposes and policies of the Marine Mammal Protection and Antarctic Conservation Acts.

Please contact me if you have any questions regarding the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Timothy J. Ragen, Ph.D.
Executive Director

Enclosure

Cc: Mr. P. Michael Payne