



MARINE MAMMAL COMMISSION

1 October 2015

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

Dear Dr. Hamady:

On 25 September 2015 the National Science Foundation (NSF) published a notice (80 Fed. Reg. 57882) requesting comments on a permit modification application from Mr. Robert Pitman, National Marine Fisheries Service's (NMFS) Southwest Fisheries Science Center (SWFSC). Mr. Pitman is seeking to modify his authorization under the Antarctic Conservation Act (the ACA) to conduct research on numerous cetacean species 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 14097, issued to the SWFSC under the MMPA, authorizes Mr. Pitman to conduct research on numerous species of whales in Antarctica. The purpose of the research is to study cetacean movement patterns, diet preferences, and genetic parameters. Mr. Pitman was authorized to conduct photo-identification of, collect biopsy samples from, and instrument numerous cetaceans with satellite and suction-cup tags in the southern Ross Sea and waters of the Antarctic Peninsula under the ACA from 7 November 2014 until 30 June 2015, when permit 14097 was set to expire. In addition, he was authorized to collect marine mammal carcasses and parts. NMFS has since extended permit 14097 under the MMPA until 30 June 2016 and has amended it to include the use of unmanned aerial systems (UASs)—both modifications are now being requested for Mr. Pitman's ACA authorization. Mr. Pitman would use the UASs to photograph killer whales, humpback whales, and Antarctic minke whales to assist with taxonomic and morphometric studies and identify prey species of killer whales and to assess fitness in humpback and minke whales.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and ACA and therefore recommends that NSF issue the ACA permit modification, contingent on inclusion of the current permit conditions. 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".

Rebecca J. Lent, Ph.D.
Executive Director