



MARINE MAMMAL COMMISSION

11 May 2016

Mr. Timothy J. Van Norman, Chief
Branch of Permits, MS: IA
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Re: Permit Application No. 84799B
(Randall Davis, Ph.D.,
Texas A&M University)

Dear Mr. Van Norman:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Dr. Davis is requesting authorization to conduct research on northern sea otters in Alaska for up to five years—similar activities were authorized under permit 078744.

Dr. Davis proposes to conduct research on northern sea otters in Prince William Sound, Alaska. The purpose of the research is to investigate localized movements and habitat use, foraging behavior, and prey preference of sea otters. Dr. Davis and co-investigators would harass, observe, and photograph/videotape up to 200 sea otters per year of either sex and any age class during vessel-based activities. He also could collect skulls and skeletal remains from up to two otters per year and conduct necropsies¹ on an unlimited number of sea otters each year. Up to 400 non-target sea otters could be harassed during the proposed activities. Lastly, Dr. Davis would obtain up to 20 frozen skulls from FWS during the five year period to conduct research on the vomeronasal gland of sea otters.

During all research activities, Dr. Davis would approach sea otters gradually to minimize or avoid any sort of startle response. Activities would be terminated if the animals exhibit extremely evasive or high-energy behavior. If any of the activities disrupt an otter that is feeding, breeding, or nursing, Dr. Davis would cease his activities immediately and slowly move away from that otter. He also would not separate a female-pup pair. When conducting foraging observations and depth measurements, Dr. Davis would collect those measurements² only after the foraging bout has been initiated. If a diving sea otter surfaces prior to proper placement of the vessel or within 50 m of the vessel, the vessel would move gradually in the opposite direction of the otter's line of travel. If a female leaves a pup at the surface while diving, the vessel would not be placed over the dive location

¹ Samples collected during the necropsy would be sent to the U.S. Fish and Wildlife Service (FWS).

² For adults without pups and subadults only.

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until the female and pup have moved at least 50 m from that location. Lastly, hauled-out sea otters would not be approached closer than 30 m. For these reasons, the Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that FWS issue the permit, as requested.

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 "L".

Rebecca J. Lent, Ph.D.
Executive Director