



MARINE MAMMAL COMMISSION

23 December 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. 11556C
(BBC, Natural History Unit)

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). BBC proposes to film southern sea otters in California from 2017–2018 for its documentary, *Natural World*.

BBC could take up to 40 southern sea otters of either sex and any age class by Level B harassment during filming activities¹ during a 2-day period. Personnel from the Monterey Bay Aquarium, U.S. Geological Survey, and U.S. Fish and Wildlife Service (FWS) would serve as advisors. If any of the filming activities (1) disrupt an otter that is feeding, breeding, nursing, or grooming or (2) cause an otter to become aggressive or nervous, the filmmakers would cease their activities immediately and slowly move away from the otter. The filmmakers also would not separate a female and her pup and would avoid approaching a lone pup². In addition, BBC would not film an individual otter for longer than 3 hours per day.

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".

Rebecca J. Lent, Ph.D.
Executive Director

¹ Filming could be conducted from shore or a small boat.

² So as to not hinder the female from reuniting with her pup after she completes a foraging bout.