



# MARINE MAMMAL COMMISSION

19 May 2014

Mr. Timothy J. Van Norman  
Chief, Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive  
Arlington, VA 22203

Re: Permit Application No. 187053  
(ABR, Inc.—Environmental Research  
and Services)

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). ABR is seeking to renew permit 187053 to conduct research activities on northern sea otters in Alaska during a five-year period.

ABR proposes to conduct surveys of sea otters year-round, primarily in Kamishak Bay within western Cook Inlet, Alaska. The objectives are to continue long-term research investigating (1) distribution and abundance and (2) effects of anthropogenic factors on sea otters, specifically construction of the Pebble Mine port.

ABR would conduct line-transect aerial surveys using fixed-wing aircraft and helicopters at a minimum altitude of 90 and 150 m, respectively. Fixed-wing surveys are conducted quarterly, whereas helicopter surveys can occur up to twice per month with two replicate surveys per trip. Researchers also would conduct line-transect surveys using small boats. Those surveys would be conducted five times per year with up to two replicate surveys per trip. Vessel surveys would occur in nearshore and offshore waters beginning 100 m from shore and any marine mammal<sup>1</sup> within 150 m of either side of the vessel would be recorded. Researchers would slow or stop the vessel when a sea otter is detected but would not approach it closer than 45 m. Further, they would not approach female-pup pairs closer than 100 m and would abide by the Responsible Marine Viewing in Alaska guidelines. However, sea otters of any age class and either sex could be harassed incidental to the aerial and vessel-based surveys (see Table 2). ABR would be authorized to take photographs during any of the surveys.

The Commission recommends that the Fish and Wildlife Service issue the permit, as requested. The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA.


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<sup>1</sup> ABR is authorized by the National Marine Fisheries Service (NMFS) to conduct surveys of marine mammals under NMFS-jurisdiction under permit 15750.

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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,



FOR

Rebecca J. Lent, Ph.D.  
Executive Director