



MARINE MAMMAL COMMISSION

10 June 2013

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

Re: Application No. 041309
(U.S. Fish and Wildlife Service,
Marine Mammals Management)

Dear Mr. Van Norman:

The Marine Mammal 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. Marine Mammals Management is seeking to renew and amend permit 041309 to conduct research on sea otters in Alaska during a five-year period.

RECOMMENDATION

The Marine Mammal Commission recommends that the Fish and Wildlife Service issue the permit, as requested.

RATIONALE

Marine Mammal Management proposes to conduct research on three populations of northern sea otters in Alaska year-round. The objectives are to continue long-term research investigating (1) population trends, (2) reproductive rates, (3) movement patterns and habitat use, and (4) disease and health of sea otters.

Researchers would harass, capture, handle, restrain, administer drugs to, measure, and sample up to 100 sea otters of either sex each year. They would capture sea otters using tangle and dip nets during daylight hours. Captured sea otters would be removed from the nets, placed in ventilated kennels, and transported to a support vessel for sedation and sampling. If a female with a dependent pup is captured, researchers would place the pup either in the same kennel or an adjacent kennel as its mother and it would be released with its mother. Researchers would not conduct the proposed activities on dependent pups. They would sedate each individual and collect blood, skin (including lesions), feces, urine, milk, vibrissae, swabs, and a pre-molar tooth from each sea otter. In addition, they would attach flipper tags to and insert PIT tags into each sea otter. For juveniles and adult sea otters only, veterinarians could surgically implant up to 50 of those sedated sea otters with either a VHF transmitter or time-depth recorder. They would (1) refrain from implanting tags in pregnant or lactating females with dependent pups, (2) measure various blood parameters prior to any surgical procedure, and (3) administer antibiotics during the surgical procedure to minimize

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infection after the procedure. All sea otters could be handled or held for an average of 90 minutes. Individual sea otters could be captured and handled up to two times during the course of the five-year permit.

Marine Mammals Management also proposes to conduct weekly vessel- and aircraft-based surveys to track the instrumented otters. They would approach a sea otter at a distance no closer than 100 m to determine its flipper tag number and observe its behavior. During aerial overflights, researchers would approach sea otters at altitudes no less than 152 m. They would hover over the individuals no more than 3 minutes. Marine Mammals Management would harass up to 25,100 sea otters per year during those surveys.

Finally, researchers would collect and conduct necropsies on up to 100 dead stranded sea otters each year. Marine Mammals Management is requesting to kill, either unintentionally or intentionally via euthanasia, up to four sea otters during the five-year period. They also would carry a crash kit to administer any drugs deemed necessary to aid in resuscitation by the veterinarian. Researchers would perform necropsies on those otters that die during capture activities as well. Samples from both live and dead otters would be sent to University of California Davis for various analyses.

Marine Mammals Management has indicated that its Institutional Animal Care and Use Committee (IACUC) has reviewed and approved the proposed procedures in the past and that its IACUC will review the procedures once it submits an updated research plan. Researchers currently collaborate with researchers from the U.S. Fish and Wildlife Service, U.S. Geological Survey, Oiled Wildlife Care Network, California Department of Fish and Wildlife, Monterey Bay Aquarium, Alaska SeaLife Center, and University of California Davis.

The Commission believes that assessing the three populations of sea otters in Alaska is necessary, not only to determine why certain populations may not be recovering as quickly as others, but also to provide essential baseline data. Therefore, the Marine Mammal 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 Marine Mammal Protection Act.

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,



Rebecca J. Lent, Ph.D.
Executive Director