



MARINE MAMMAL COMMISSION

28 October 2013

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. 101713
(The Marine Mammal Center)

Dear Mr. Van Norman:

The Marine Mammal Commission (the MMC), 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). The Marine Mammal Center (TMMC) is seeking to renew and amend permit 101713 that authorizes it to collect, rescue, transport, relocate, rehabilitate, and release to the wild southern sea otters. The permit would be valid for a five-year period.

RECOMMENDATION

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

RATIONALE

TMMC is requesting authorization to take southern sea otters for the purposes of enhancement associated with rescue, rehabilitation, and release to the wild under section 10 of the Endangered Species Act and section 109(h) of the MMPA. TMMC would collect, rescue, transport, relocate, rehabilitate, and/or release back to the wild live-stranded sea otters. TMMC would rehabilitate all age classes of sea otters except dependent pups, which would be transported to the Monterey Bay Aquarium for rehabilitation. TMMC's facilities in San Luis Obispo, Monterey Bay, and Sausalito could temporarily house sea otters of any age. However, only its Sausalito facility is equipped for full rehabilitation.

Researchers would capture, restrain, sedate, measure, and sample up to 50 sick, injured, or abandoned sea otters of either sex and all age classes each year. Sea otters would be captured on land with salmon nets or by hand prior to transport to the closest facility. The attending veterinarian would use drugs, including sedatives, only if medically necessary for the recovery of the animal or during diagnostic or life-saving procedures. TMMC could collect blood, urine, feces, saliva, nasal secretions, and tissue samples for diagnostics. Samples could be sent to various laboratories in the United States for analysis. In certain instances, sea otters are relocated to a more suitable location rather than transported for rehabilitation. TMMC would not harass any non-target sea otters during the capture activities.

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Prior to releasing any sea otter, TMMC would attach flipper tags (plastic temple tags) to and insert PIT tags into each sea otter. TMMC could release otters at sites consistent with the National Marine Fisheries Service's Best Practices for Marine Mammal Response, Rehabilitation, and Release.

In addition, TMMC is requesting authorization for the intentional deaths via euthanasia or unintentional deaths of up to 50 sea otters each year due to the compromised health status of stranded sea otters. Full post-mortem examinations would be conducted on all of those sea otters.

The MMC believes the rescue and rehabilitation of sea otters has supported the sea otter's recovery in California and recommends that the Fish and Wildlife Service issue the permit, as requested.

The MMC believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA.

The MMC appreciates the opportunity to comment on this permit application. Kindly contact me if you have any questions concerning the MMC'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".

Rebecca J. Lent, Ph.D.
Executive Director