



MARINE MAMMAL COMMISSION

28 September 2015

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 Amendment Application No. 672624
(U.S. Geological Survey)

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 amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). The U.S. Geological Survey (USGS) is seeking to amend permit 672624 to conduct research on southern sea otters in California—the permit expires on 12 September 2018.

USGS is authorized to harass, observe, capture, handle, restrain, transport, administer drugs to, measure, sample, and instrument sea otters year-round. Researchers can conduct the activities on sea otters of either sex and on all age classes¹ and collect and conduct necropsies on an unlimited number of dead stranded sea otters each year. USGS also is authorized to kill² up to two sea otters during the five-year period. The objectives are to continue long-term research investigating (1) population trends, (2) demography, (3) movement patterns and habitat use, (4) foraging ecology, and (5) disease and health of sea otters.

USGS is requesting to amend its permit to include the use of remote camera and prey arrays³ and underwater divers to film foraging sea otters—BBC⁴ would collaborate with USGS on this project. Researchers could harass sea otters of either sex and any age class⁵. The purpose is to investigate natural foraging behavior of wild sea otters feeding on invertebrate prey. USGS has indicated that its Institutional Animal Care and Use Committee has reviewed and approved the proposed research protocols.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that the Fish and Wildlife Service issue the permit

¹ Including conducting invasive procedures on pups weighing more than 5 kg.

² Intentionally via euthanasia or unintentionally.

³ Prey arrays would be comprised of naturally occurring sea otter prey items within its habitat. The arrays would not affect sea otter access to prey or alter normal sea otter foraging behavior—the goal of the prey arrays is to facilitate accurate estimation of prey depredation rates by the researchers.

⁴ BBC also has permit 59492B that authorizes filming of sea otters for the *Ocean* documentary.

⁵ Including pups older than 3 months of age.

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amendment, contingent on inclusion of the current permit conditions. Please 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, sweeping initial "R".

Rebecca J. Lent, Ph.D.
Executive Director