MARINE MAMMAL COMMISSION

16 July 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. 067925
(U.S. Geological Survey,
Alaska Science Center)

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. The U.S. Geological Survey (USGS) is seeking to renew and amend permit 067925 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 (FWS) issue the permit, as requested.

RATIONALE

USGS proposes to conduct research on the 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, (4) foraging ecology, (5) disease and health of sea otters, and (6) long-term effects of the *Exxon Valdez* oil spill.

Researchers would harass, capture, handle, restrain, administer drugs to, measure, sample, administer Evans blue dye and collect serial blood samples from, tag, and instrument up to 70 sea otters of either sex each year. They would capture sea otters using Wilson traps, tangle nets, 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 as or in an adjacent kennel to 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 or semen, vibrissae, swabs, blubber, a liver biopsy, and a pre-molar tooth from each sea otter. To collect milk samples, researchers would administer oxytocin only to females with dependent pups that are known to be lactating. 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 those sedated sea otters with either a VHF transmitter or time-

depth recorder. They would (1) refrain from implanting tags in third trimester females (i.e., females with near-term fetuses that exhibit well-ossified skulls the size of a lemon) and (2) administer antibiotics during the surgical procedure to minimize infection after the procedure. All sea otters could be handled or held for up to two hours. Although USGS plans to recapture individuals only once to retrieve the instruments, it has requested authorization to capture and handle individual sea otters up to four times during the course of the five-year permit. Researchers could harass up to 30 non-target sea otters per year during those proposed activities.

USGS also proposes to conduct annual line-transect surveys to track the instrumented otters and to assess the populations along the Katmai coast and in the Kenai Fjords, Prince William Sound, Glacier Bay, Cross Sound, and Icy Strait. They would approach a sea otter using a fixed-wing floatplane at altitudes no less than 91 m to determine their flipper tag numbers and observe their behavior. They would circle the individuals for no more than 3 minutes. USGS would harass up to 29,374 sea otters per year during those surveys.

Finally, researchers would collect and conduct necropsies on an unlimited number of dead stranded sea otters each year. Up to 60 samples (both soft and hard parts) could be imported each year from Canada, Russia, and Japan. USGS is requesting to kill, unintentionally or intentionally via euthanasia, up to two sea otters during the five-year period during any of the proposed activities. 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 analyzed by USGS and the University of Alaska.

USGS has indicated that its Animal Care and Use Committee (ACUC) has reviewed and approved the proposed procedures in the past and that its ACUC will review the procedures again when it submits its annual research plans. Researchers currently collaborate with researchers from FWS, USGS Western Ecological Research Center, Monterey Bay Aquarium, Alaska SeaLife Center, University of Alaska, and Department of Fisheries and Oceans Canada.

The Commission believes that assessing the three populations of sea otters in Alaska is necessary, not only to determine long-term effects of the oil spill on sea otters, but also to provide essential baseline data. Therefore, the Marine Mammal Commission recommends that FWS 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

Rebecca J. Lent, Ph.D.
Executive Director