

MARINE MAMMAL COMMISSION
1625 EYE STREET, N. W.
WASHINGTON, DC 20006

2 December 1980

Mr. Lynn A. Greenwalt
Director
Fish and Wildlife Service
U.S. Department of the Interior
Washington, D.C. 20240

Dear Lynn:

We are concerned that the progress which has been realized to date in addressing the many facets of the California sea otter problem has been less encouraging than we had expected. The resolution of the problem will require decisions and actions to secure the population from threats associated with oil spills and other human activities and to restore it to the optimum sustainable population level, while at least minimizing conflicts between sea otters and fisheries. While a variety of efforts are underway, we believe that these efforts can and must be focused and structured more clearly if we are to resolve the sea otter problem in the near future.

With these thoughts in mind, the Commission recommends that the Service adopt and implement the following approach to the problem:

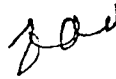
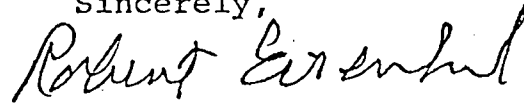
- (1) recognize the ultimate need for "zonal management" of the California sea otter pursuant to which the sea otter would be restored to additional sites within its former range although not to each and every area it once inhabited. Such "zonal management" would be based upon a determination that the Marine Mammal Protection Act's goal of optimum sustainable population can and should be achieved with reference to the "health and stability of the marine ecosystem" and that historic levels and distribution are not necessary to satisfy that goal;
- (2) recognize that the implementation of such "zonal management" will require, among other things: (a) designating sea otter areas or "zones" that will be

secure from threats of those human activities including oil spills that would adversely affect the sea otters and that will allow otters to recover to and maintain optimum levels and contribute to the health and stability of the marine ecosystem; and (b) designating areas or "zones" where there will be no sea otters because the habitat is not suitable, they did not formerly inhabit those areas, the threats to otters that might be translocated there would be too severe, or the conflicts between otters and fisheries would be substantial;

- (3) recognize that implementation of such "zonal management" will almost certainly require the development and utilization of effective techniques to maintain the otters within the designated otter zones and to keep them out of designated otter-free zones, and/or selection of otter zones that will, because of the nature of adjacent habitat or other considerations, be naturally self-limiting;
- (4) recognize that it is not necessary to complete all designations before taking action and that it is necessary to establish at least one additional group of sea otters at a site that is secure from the threat of oil spills as soon as possible;
- (5) complete the review and evaluation of available information and, in consultation with interested parties and while continuing the overall effort, decide where to translocate the first group of otters while taking into consideration the potential of the site to be self-limiting, its suitability as sea otter habitat, its accessibility for monitoring purposes, its security from threats, the nature and extent of possible conflicts with fisheries, and perhaps other factors;
- (6) decide the age and sex composition as well as number of otters to be translocated, with reference to: the likelihood of that group's survival; impacts upon the population from which the group is removed; the area from which it should be removed; and translocation techniques to be used; and
- (7) accomplish the first translocation as soon as possible and closely monitor and evaluate the results thereof, while at the same time continuing other aspects of the California sea otter research and management program.

Obviously, the various elements of this approach are only summarized above, and we shall be pleased to discuss them in greater detail with specific reference to the recovery plan, our previous recommendations for compilation and mapping of available information, and the resource inventories and characterizations and other research efforts relating to this matter whenever would be convenient. However, we do believe that it is important and possible to select the site and accomplish the first translocation within the next 18 months, and would be grateful for your early response to our recommended overall strategy and the suggestion that the first translocation be accomplished within 18 months.

Sincerely,



John R. Twiss, Jr.
Executive Director

cc: Rupert Bonner
E. Charles Fullerton
Ronald E. Lambertson
Margaret Owings
William D. Sweeney
Charles D. Woodhouse, Jr.