

June 26, 2002

Rosa Meehan
Chief, Marine Mammals Management
U.S. Fish and Wildlife Service
1101 East Tudor Road
Anchorage, AK 99503

RE: ALASKA SEA OTTER STOCK ASSESSMENT REPORTS

Dear Ms. Rosa Meehan,

Defenders of Wildlife (Defenders') is submitting the following comments on the Alaskan sea otter stock assessment reports (SAR), revised February 13, 2002 and posted for public comment on March 28, 2002.

INTRODUCTION

We appreciate the efforts of U.S. Fish and Wildlife Service (FWS) in undertaking the necessary research and efforts in changing the stock determination for the northern sea otter (*Enhydra lutris kenyoni*) found in Alaska. Based on the last SAR, published in 1998, the Alaska sea otter was recognized as one stock. On the basis of their review, researchers have suggested the following classification: (1) the southeast stock extends from Dixon Entrance to Cape Yakataga; (2) a south central stock extends from Cape Yakataga to Cape Douglas and includes Prince William Sound and the Kenai peninsula coast; and (3) a southwest stock includes the Alaska peninsula coast, the Aleutian Islands to Attu Island, Barren, Kodiak, Pribilof Islands, and Bristol Bay.

STOCKS

It is our understanding, while the southwest stock has experienced severe declines, the best available scientific information suggests that the southeast stock continues to grow in numbers and expand in range. The southcentral stock, that includes Prince William Sound, is believed to be either stable or increasing in numbers.

Given that dramatic sea otter declines have been observed in the Aleutian Islands over the past decade, along with many researchers surmising that the onset of this population drop began in the 1980s; it is so important to the recovery of this population to separate out these distinct stocks which might afford the affected stocks more protections. With declines as high as 90% on some islands in the central Aleutians and an overall decline of 70% from 1992-2000, and the additional information documenting an estimated 91-92%

decline along the South Alaskan Peninsula, declines of 36-56% along the North Alaskan Peninsula and a 40% decline along the Kodiak Archipelago, this lends great support to these stock delineations.

We support the finding that the southwest stock has been defined as a strategic stock, as defined under the Marine Mammal Protection Act (MMPA), and that a thorough review is underway to list the southwest stock under the Endangered Species Act. We urge FWS to make every effort to expedite this process. These declines have been going on for far too long and are so dramatic in scope, that any further delays in granting them necessary legal status would be detrimental to the potential recovery of the southwest stock.

While we understand, as currently proposed, that the SAR proposes a non-strategic designation for the southcentral and southeastern stocks; we support all efforts to continue thorough and consistent monitoring of these populations. Because the causes of the southwest population declines are not entirely understood, it would be prudent to closely observe the remaining stocks for signs of population shifts. This would require annual surveys and a more improved stranding network and necropsy program for Alaskan sea otters.

STRANDING NETWORK/NECROPSY PROGRAM

FWS and the Alaska Sea Otter and Steller Sea Lion Commission currently co-administer the Sea Otter Biosampling Program (SOBP). Through this program, it is our understanding that, “approximately 55 coastal Alaska Natives have received training to conduct sea otter necropsies using standardized methods and to collect baseline data on a wide variety of sea otter health issues including basic biology and life history” (excerpted from summary of co-management agreement). It appears that this program has been successful in analyzing sea otters for contaminants, genetics, diet, parasite load, and histopathology, but suffers, like most necropsy programs, from the necessary level of funding to do a complete and thorough review of all strandings. In addition, involvement from the public could bolster this program. In California, there are flyers and website information listing a set of contacts for the public to inform in the event that a sea otter is found dead, sick or injured. We understand the remoteness and inaccessibility of many areas throughout Alaska, and body condition of sea otters found make it difficult to successfully recover and, if recovered, identify the cause of death. However, Defenders’ believes that, through educational outreach, the current SOBP could benefit from a better involvement from Alaskans on how to proceed when a sea otter is found and more community involvement in beach-cast carcass surveys.

ANNUAL HUMAN-CAUSED MORTALITY

Defenders’ believes that because fisheries interactions have played a dramatic role in sea otter population fluctuations in California that every effort be made to improve fisheries observer programs and other ways of documenting potential effects of fisheries on sea otters in Alaska. While, the SAR reports that mortality incidental to commercial fishery operations is “insignificant,” Defenders’ concern is that this factor may not be accurately represented based on the amount of coverage of the fisheries likely to be interacting with sea otters. There is

Ms. Rosa Meehan
June 26, 2002
Page 3 of 3

documentation in the SAR that 33.8% of the Bering Sea groundfish fishery was observed in 1992. However, there is no mention of the level of trap or net fisheries monitored for incidental bycatch.

Contaminants and their effects on Alaskan sea otter populations are areas that also could be better assessed. As discussed above, if the SOBP and beach-cast survey can be assisted with further funding and personnel, this mortality factor could be better understood.

Lastly, there is mention in the SAR of the removal of Alaskan sea otters for public display, more specifically in recent years for aquaria in Japan. Defenders is not opposed to sea otters in public aquaria, however, we have submitted letters, along with other environmental groups, expressing concern over the capture of sea otters from an area where the geographic extent of the declines is not entirely understood, nor are the causes of the decline. In addition, many of the aquaria interested in capturing Alaskan sea otters do not meet comparable U.S. permit standards under the MMPA. The SAR indicates that there, "have been no observed effects on sea otter populations" in any of the three stocks from these activities. In 2000, based on findings by the Marine Mammal Commission and Animal and Plant Health Inspection Services, among others, these permits were denied. More applicants have had their permits carefully reviewed for a variety of reasons.

Thank you for considering these comments. Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jim Curland". The signature is written in a cursive, flowing style.

Jim Curland,
Marine Program Associate

Cc: Rob Mattlin-**Marine Mammal Commission**
Dr. Jim Estes-**U.S. Geological Survey, BRD**
Cindy Lowry-**Sea Otter Defense Initiative**
Brent Plater-**Center for Biological Diversity**
Don Baur, Esq.
Don Mooney, Esq.