

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

11 July 1980

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

Dear Lynn:

I enclose a copy of our letter responding to the Service's request for comments on the Technical Draft of the Southern Sea Otter Recovery Plan. As noted in the letter, we find the introductory or background sections of the draft to be reasonably complete and useful, and consider the plan itself to be incomplete but nonetheless a start on plan development.

In our 23 August 1979 letter, we made a number of recommendations concerning the development of a recovery plan and other actions needed to protect and conserve the Southern sea otter population. Judging from the format and content of the Technical Draft, the Service has adopted some, but may not have adopted all, of the recommendations. For example, the Service has accepted the recommendation that the plan be designed to restore the Southern sea otter population to its optimum sustainable level (and not be limited simply to removing the Southern sea otter from the "threatened" list), but the Service may not have adopted either the recommendation that the plan describe precisely what actions must be taken, by whom, when, and with what resources (in terms of personnel and money) to achieve the desired goal, or the recommendation that the Service develop a series of maps and an accompanying text summarizing available information that must be considered in determining actions appropriate to achieve the goal. Also, since sea otter/fishery interactions are not addressed directly in the Draft, does this mean that the Service does not concur with our view that restoring the Southern sea otter population to its optimum sustainable level will require resolving fundamental issues concerning the sea otter/fishery interactions from the perspectives both of sea otter predation and the adverse impacts of human activities on sea otters?

Since these and other recommendations were made in August 1979 or before, and we have not been advised to the contrary, we assume that they have been adopted but that unforeseen problems may have come up in implementing them. I would be grateful, therefore, if you would advise us, either during or before the Sea Otter Steering Group meeting scheduled for the 24th and 25th of July, as to:

1. Whether the fact that the effects of sea otter/fishery interactions are not directly addressed in the Draft plan was an oversight or meant that the Service does not concur with the Commission's view that restoring the Southern sea otter population to its optimum sustainable level will require resolving fundamental issues concerning the sea otter/fishery conflicts as well as the potential adverse impacts of human activities on sea otters;
2. Whether the lack of detail in the Draft plan indicates that the Service does not concur with the Commission's view that the recovery plan should identify precisely what actions must be taken, by whom, when, and with what resources; and
3. What steps the Service has taken or plans to take to compile and evaluate available information on: (a) the current and historical distribution and density of sea otters in California and adjoining areas; (b) the historical and current distribution and densities of relevant fishery resources and fisheries in California and adjacent areas; (c) biological productivity and other characteristics of current and potential sea otter habitats in California and adjacent areas; (d) the possible direct and indirect effects of present and proposed human activities, such as offshore oil and gas development and shore-based development, on sea otters and/or their habitat; and (e) such other data as may be relevant to decisions relating to the protection and conservation of the Southern sea otter population.

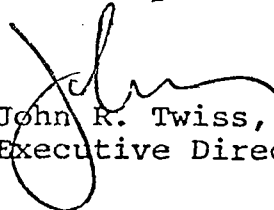
We would also be grateful if you would advise us as to: the procedure and schedule that will be followed in finalizing and adopting the recovery plan; and, the specific research and management actions that will be undertaken in the period before the recovery plan is finalized, adopted, and implemented.

We are pleased that Carl Benz is now able to devote himself fully to the recovery plan, and believe that we should now be able to realize rapid progress.

Should you have any questions about this request or our comments, I shall be pleased to discuss them with you.

With best regards,

Sincerely,



John R. Twiss, Jr.
Executive Director

Enclosure

cc with enclosure: Dr. F. Eugene Hester
Mr. Ronald E. Lambertson
Mr. Harold O'Connor