

LETTER FROM CONCERNED SCIENTISTS

March 6, 2006

Diane Noda
Field Supervisor
U.S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
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Dear Diane Noda:

We applaud the U.S. Fish and Wildlife Service's (FWS) preferred alternative presented in the Draft Supplemental Environmental Impact Statement (DSEIS) on the translocation of southern sea otters. The DSEIS represents an important and scientifically responsible step toward successfully recovering the southern sea otter. In the final SEIS and proposed regulations to implement it, we strongly urge the FWS to implement the preferred alternative of terminating the Southern Sea Otter translocation program, ending the no-otter management zone south of Pt. Conception, and allowing the sea otters currently residing south of Pt. Conception, including sea otters residing around San Nicolas Island (SNI), to remain. This action will allow sea otters to move freely and naturally expand their range, which will help ensure this species' survival and recovery.

Historically, the southern sea otter could be found all along the California coast and into Baja California, likely numbering 16,000 in the 1800s. Fur traders then killed almost all southern sea otters, with only a few dozen surviving in a remote cove off of Big Sur. They were declared threatened under the Endangered Species Act (ESA) in 1977, and today there are about 2,500 sea otters along our coast. Sea otters are the classic example of a keystone species. Sea otters allow for a natural check in the nearshore ecosystem by keeping populations of invertebrate grazers, such as sea urchins, from overtaking the system and denuding the kelp forests. The near-extinction of sea otters along the California coast altered the coastal ecosystem; bringing back sea otters throughout their range represents a critical step to restoring coastal ecosystems—creating healthy kelp forests and diverse populations of fish and invertebrate species.

In 1987, the FWS began a translocation program to establish a new colony of southern sea otters on SNI in an attempt to protect the species from a catastrophic event (e.g., an oil spill) and ultimately restore their dwindling numbers off the coast of California. Out of the original 140 sea otters translocated from 1987-1990 to SNI, just over 30 remain at the island today. The others either died or swam away and three years after the translocation program ended in 1990, there were fewer than 25 sea otters at SNI. While the population at SNI has shown some signs of recruitment, it is far from the predicted viable population that FWS estimated at 150-500 sea otters.

In addition, capturing and transporting sea otters tends to be unsuccessful because typically the sea otter is harmed or simply swims back to its initial location. For example, between 1987 and 1993, 24 sea otters were moved, and 4 of those animals died. Also introducing a new sea otter into an already existing group of sea otters may disrupt the established social hierarchy of that group. Because moving sea otters places them at risk, the FWS and the Southern Sea Otter Recovery Team concluded that moving otters and impeding natural range expansion southward is likely to jeopardize the species' continued existence.

The southern sea otter translocation program has failed to meet its objective of establishing a viable, independent colony of sea otters to serve as a safeguard for the population, as a whole, in the event of a natural or human-caused event. The recovery and management goals for southern sea otters cannot be met by continuing the program. Given that in the last ten years, the southern sea otter population has exhibited periods of growth and decline, and is still listed as threatened under the ESA, we are especially pleased to see the FWS recommendation to both protect and allow the sea otters currently in the translocation and management zones to remain.

Implementation of the preferred alternative in the DSEIS will ensure a sustainable sea otter population and will allow sea otters to expand their range. We strongly urge you to finalize the SEIS and to implement the preferred alternative.

Sincerely,

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