

COASTAL CONSERVANCY

Staff Recommendation
December 1, 2022

SEA OTTER RECOVERY GRANTS 2023

Project No. 08-079-12
Project Manager: Irvin Tang/Hilary Hill

RECOMMENDED ACTION: Authorization to disburse up to \$272,540 to Defenders of Wildlife, Sea Otter Savvy, and University of California at Santa Cruz to implement three separate projects to aid in recovery of the southern sea otter.

LOCATION: Nearshore waters from Del Norte County to Santa Barbara County

EXHIBITS

- Exhibit 1: [Project Location Map](#)
Exhibit 2: [California Sea Otter Fund — Summary of Projects](#)
Exhibit 3: [Project Letters](#)
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RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed two hundred seventy-two thousand five hundred forty dollars (\$272,540) to implement three projects to assist in the recovery of the southern sea otter, specifically as follows, to:

- Defenders of Wildlife: fifty-six thousand dollars (\$56,000) to conduct a conceptual planning process for the reintroduction of sea otters into northern California.
- Sea Otter Savvy: seventy-five thousand two hundred dollars (\$75,200) to conduct an educational outreach and community engagement program on responsible viewing of wild sea otters to reduce sea otter disturbance.
- University of California at Santa Cruz: one hundred forty-one thousand three hundred forty dollars (\$141,340) to carry out research on sea otter social structure and stressors to inform sea otter reintroduction planning.

Prior to commencement of each project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. Evidence that all permits and approvals required to implement the project have been obtained.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 5.5 of Division 21 of the Public Resources Code, regarding Integrated Coastal and Marine Resource Protection.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. Defenders of Wildlife and Sea Otter Savvy are nonprofit organizations organized under section 501(c)(3) of the U.S. Internal Revenue Code.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends that the Conservancy disburse \$56,000 to Defenders of Wildlife, \$75,200 to Sea Otter Savvy, and \$141,340 to the University of California at Santa Cruz (UCSC) to undertake three separate projects to aid the recovery of the southern sea otter. Defenders of Wildlife will conduct a collaborative conceptual planning process for the reintroduction of sea otters into northern California. Sea Otter Savvy will conduct an educational outreach and community engagement program on responsible viewing of wild sea otters to reduce sea otter disturbance in Santa Cruz, Monterey, and San Luis Obispo counties. UCSC will carry out research on sea otter social structure and stressors, which will inform sea otter reintroduction planning.

The southern sea otter (*Enhydra lutris nereis*) is an ecologically important species that faces numerous challenges, from disease and shark bite mortality to resource limitations in large portions of its occupied range. Southern sea otters were hunted to near extinction in the early part of the 20th century and listed as a federally threatened species in 1977. Currently, the population numbers around 2,962 animals inhabiting the near-shore marine environments adjacent to San Mateo County south to Santa Barbara County. This is far less than the historical southern sea otter population levels estimated at approximately 16,000-20,000 animals, which inhabited a range along the entire California coast and south into Baja California. To address this decline and slow recovery, taxpayers can voluntarily contribute to the California Sea Otter Recovery Tax Fund, of which the Conservancy receives approximately half the proceeds for expenditure on projects that will assist in the recovery of sea otters. In May 2022, the Conservancy solicited project proposals aimed at recovery of the southern sea otter. The Conservancy received three proposals and staff recommends funding the three projects described below.

1. Defender of Wildlife’s Conceptual Planning for Sea Otter Reintroduction.

The Defenders of Wildlife will conduct a collaborative conceptual planning process for the reintroduction of sea otters into northern California that will engage a wide range of stakeholders. Research has found that sea otters are near the maximum number of individuals that can be supported in their current range on the Central Coast (which is only 13% of their historical range) due to limited food and resource availability. For continued population recovery, sea otters need to expand beyond their existing range into new, resource-abundant territories. Failure to expand their range limits the species’ recovery and keeps them susceptible to potentially catastrophic environmental threats, such as an oil spill. As the sea otter population has not naturally expanded its range in California in over a decade, reintroduction of sea otters into their historical range has been proposed as a recovery strategy. The federal Consolidated Appropriations Act of 2021 directed U.S. Fish and Wildlife Service (USFWS) to determine the feasibility and cost of restoring sea otters along the West Coast. This feasibility assessment was completed in June 2022 and concluded that reintroducing sea otters to northern California is feasible and would result in significant conservation benefits to the species and nearshore marine ecosystem.

With Conservancy funding, Defenders of Wildlife will take the next step and build upon the feasibility assessment to collaboratively develop a Conceptual Plan that outlines a comprehensive roadmap of steps and strategies that are needed to fully evaluate the potential for sea otter reintroduction in California and what planning is necessary before reintroduction can occur. The full reintroduction planning process, which is outside the scope of the proposed project, is expected to include steps such as a robust stakeholder engagement process, socioeconomic impact studies, other studies to resolve data gaps and uncertainties, permitting, and funding. The proposed project will engage a wide range of partners and stakeholders including conservation practitioners, scientists, fisheries groups, and Tribal Nations in creating the Conceptual Plan. Partners and stakeholders will provide input to create a robust road map, including what steps need to be considered, details of what needs to be done or considered in each step, who should lead or participate in the steps, what resources are required, and at what stage in the process each step should occur. Although Defenders of Wildlife is the lead, the project will be a collaborative process to bring multiple perspectives and expertise to create a comprehensive Conceptual Plan. There is broad support from the sea otter conservation practitioners (Exhibit 3) that the proposed project is necessary to lay the groundwork for moving forward with reintroduction as a potential recovery tactic for the southern sea otter population.

2. Sea Otter Savvy’s Educational Outreach and Community Engagement Program.

Sea Otter Savvy will implement its “Sea Otter Savvy” educational outreach and community engagement program that promotes responsible viewing of wild sea otters to reduce disturbance and harassment. Sea otters are widely beloved by the public, and this charismatic species draws kayakers, photographers, stand-up paddlers, wildlife tour operators, scuba divers, and other marine recreationists to view them. However, people viewing sea otters often approach too closely and disturbance to sea otters has become a persistent and widespread issue. Sea otters have high metabolisms to keep them warm, which requires them

to eat nearly 25% of their body weight in food each day and spend most of their day foraging or resting to conserve their critical energy reserves. Frequent and repeated human disturbance of sea otters throughout the day threatens this balance. Research conducted by Sea Otter Savvy's citizen science team revealed that female otters are 30% more likely to be active when marine crafts are nearby. Female sea otters are especially vulnerable to disturbance during their reproductive stage, and in extreme cases the additional stress caused by human disturbance may lead to pup abandonment or death. As sea otters become acclimated to the regular proximity of humans, they can also lose their natural fearfulness, leading to unwanted, aggressive interactions—which in some cases has necessitated the permanent removal of a wild sea otter from the wild. The number of marine recreationists using coastal waters of the Central Coast continues to rise, especially during the COVID-19 pandemic when restrictions on indoor activities has resulted in a record number of visitors and revenues for kayak rental businesses.

The proposed project will implement the Sea Otter Savvy outreach program to inspire responsible viewing of wild sea otters and modify the expectation of viewing proximity to sea otters to reduce this stressor on sea otters. The program will engage and educate the wildlife-viewing public through a multi-faceted outreach program, targeting heavily-trafficked locations such as Santa Cruz, Moss Landing, Cannery Row in Monterey, Morro Bay, and Avila Beach and working with 30+ commercial operators and local Harbor Districts. This work will include:

- Online media including social media engagement, videos, and website.
- Printed materials such as stickers on rental marine crafts that provide clear guidelines for responsible viewing of sea otters, and field guides with tips for safe wildlife viewing.
- In-person outreach such as pop-up information stations at disturbance hotspots, school programs, public presentations, and other events (Sea Otter Awareness Week).
- Business certification program “Community Active Wildlife Stewards” to recognize local businesses with responsible wildlife stewardship practices.

As part of the proposed project, Sea Otter Savvy will work with the Northern Chumash Tribal Council to integrate the Tribe's cultural perspective into Sea Otter Savvy outreach materials and invite the Tribe's participation in outreach events. As part of the proposed project, Sea Otter Savvy will also conduct an evaluation of the effectiveness of their suite of outreach strategies to inform priorities for future Sea Otter Savvy programming.

The Conservancy has funded the Sea Otter Savvy program since 2016 because the Federal Southern Sea Otter Recovery Plan identifies public outreach and education as a recommended action. Prior to the Sea Otter Savvy program, no long-term, systematic efforts to mitigate the problem of sea otter disturbance and harassment existed. Although law enforcement may investigate the most egregious cases of disturbance, the problem is vast, diffuse, and ongoing. Without continued intervention, the problem of sea otter disturbance and harassment in densely populated areas is likely to continue.

3. UCSC's Study on Habitat Use, Stressors, and Social Structure in an Estuarine Sea Otter Population.

UCSC will carry out research on sea otter social structure and cumulative stressors, which will inform sea otter reintroduction planning. Two of the primary questions faced by managers when considering sea otter reintroductions are where and how sea otters should be reintroduced. In terms of where sea otters should be reintroduced, the proposed project will compare the difference between estuaries and the outer coast in terms of the cumulative stress sea otters are exposed to in each location. Estuaries have been identified as potentially favorable sites for reintroduction as they provide safety from white shark bites, shelter from rough seas, an element of physical containment that may discourage immediate emigration, and reduced potential for conflict with fisheries. However, estuaries may reach local carrying capacity relatively quickly (especially if small), which may also cause physiological stress from resource competition, and they also tend to have higher concentrated levels of human activity than the outer coast which can increase human disturbance to sea otters. Cumulative stress of sea otters is important to consider as elevated stress can be detrimental to the health of individuals and performance of populations over time. The proposed project will study the cumulative stress that sea otters have in estuaries and outer coast by measuring cortisol levels in hair samples of otters from Elkhorn Slough and outer coast locations (Monterey and Big Sur).

The question of how sea otters should be reintroduced is also important, with discussions focused on whether to use translocation of captured wild otters, or to use surrogate-reared juveniles (juveniles that were formerly stranded, rescued, and reared by surrogate sea otter mothers in a captive setting). Nearly all previous sea otter reintroductions in the North Pacific have used sea otters captured from the wild, but these translocations all lost about 90% of the animals to emigration and/or mortality, indicating there are factors beyond just high-quality habitat and prey availability that impact success of reintroduction. Reintroductions using surrogate-reared juvenile sea otters are expected to have much lower rates of attrition because the animals do not have an established home range in the wild. Such reintroductions have not yet occurred in unoccupied habitat, so retention rates are unknown. Managers need a better understanding of sea otter behavior and the importance of social structure (affiliations and antagonisms, how social relationships originate and are maintained, timescales of social relationships) to inform reintroduction efforts as there is little data on this topic. This information will allow managers to optimally select animals for reintroduction, or to properly ensure bonding between surrogate-reared sea otters before release. UCSC in coordination with the U.S. Geological Survey and other partners are tagging and sampling 50 sea otters in Elkhorn Slough which includes capturing, sedating, tagging and sampling, and releasing the animals. Through the proposed project, these focal study animals will be monitored daily and analyzed to understand their behavior and social structure. DNA analysis will be conducted to determine relatedness amongst the study animals.

With Conservancy funding, UCSC will carry out two years of this three-year study and UCSC is pursuing additional grant funding to cover the final year of study. Upon completion of the proposed project, UCSC will deliver a preliminary report analyzing: (1) the findings of the differences in cumulative stressors between different locations; (2) the findings of patterns of behavior, social interactions, and the genetic relatedness of study animals in relation to social

dynamics; and (3) discussion of the implications for potential future reintroduction efforts. This information will be utilized in sea otter reintroduction planning efforts, as well other applications in the sea otter research field.

Site Description: Southern sea otters' historic range is from Oregon to Baja, but the species currently inhabit only San Mateo County to Santa Barbara County. They are mostly found in kelp beds in the nearshore environment, generally found in water depths of sixty-five feet or less to forage along the ocean floor. Over the last 20 years, they have also been found to thrive in salt marshes and eelgrass beds in estuaries, such as Elkhorn Slough and Morro Bay.

1. Defender of Wildlife's project will take place in various meeting forums throughout Central and Northern California. The project's proposed area for conceptual planning for southern sea otter reintroduction is the California coast from San Francisco Bay to the Oregon border.
2. Sea Otter Savvy program focuses outreach efforts on areas with a high frequency of disturbance reports caused by humans on southern sea otters including Santa Cruz, Moss Landing, the Cannery Row area of Monterey, Morro Bay, and Avila Beach. In addition, Sea Otter Savvy will engage in statewide venues that offer exposure to the broad target audience of marine recreationists and wildlife enthusiasts.
3. UCSC's project will take place in Elkhorn Slough. Elkhorn Slough is the only estuary that has been fully recolonized by southern sea otters and as such, it is the best source of information on what to expect if southern sea otters are reintroduced to California estuaries in the future. Elkhorn Slough was the site of a previous sea otter research project that was conducted from 2013 to 2016, with the support of State Coastal Conservancy, which captured the population dynamics in Elkhorn Slough as the sea otter population reached carrying capacity in 2016. This project is expanding on that study to understand what happens after a sea otter population reaches carrying capacity.

Grant Applicant Qualifications:

1. Defenders of Wildlife has the capacity to manage a state grant, as they have successfully previously managed a previous Conservancy grant, have qualified grant and fiscal management staff, and the organization has an annual revenue of almost \$50 million. Defenders of Wildlife has extensive experience with federal and state wildlife management grants and reintroduction projects. Over the years, Defenders of Wildlife have successfully engaged with state and federal agencies, tribal representatives, and various stakeholders (such as landowners, commercial businesses, and other environmental NGOs) to accomplish collaborative conservation projects, such as deploying conflict reduction tools to landowners and livestock managers that reduced the unwanted encounters between livestock and grey wolves.
2. Sea Otter Savvy has successfully implemented Conservancy grants for the Sea Otter Savvy program from 2016-2022. Previously operating under fiscal sponsors, Sea Otter Savvy is now incorporated as a 501(c)(3) non-profit organization and has administered its grant successfully for the past year. Sea Otter Savvy is uniquely positioned to carry out this project as its mission and experienced staff is focused on increasing awareness about sea otter conservation through outreach. Sea Otter Savvy originated in 2015 when the need for a new outreach program was

collaboratively identified by representatives from U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Monterey Bay Aquarium, and Friends of the Sea Otter.

3. UCSC is an academic institution that has extensive experience conducting research projects and has a fiscal system and staff dedicated to financial operations that can administer a state grant. The project will be completed by Dr. Terrie Williams's lab, which is comprised of qualified researchers including 1) Dr. Terrie Williams, a comparative eco-physiologist with 35 years of research experience and who has managed millions of dollars in grants during her career; 2) Lilian Carswell, the Southern Sea Otter Recovery and Marine Conservation Coordinator for the U.S. Fish and Wildlife Service, where she has worked on sea otter and marine policy issues since 2002; 3) Michelle Staedler, formerly of Monterey Bay Aquarium, a sea otter research biologist with over 30 years of experience managing sea otter research projects.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

Selection Criteria

1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.

See the "Consistency with Conservancy's Strategic Plan" section below.

2. Project is a good investment of state resources.

The proposed projects will implement recommendations in the Federal Recovery Plan for the California Sea Otter using funds targeted for the recovery of these species. The purpose of the funding source is the primary criteria used to select the projects. The three proposed projects leverage non-state resources and provide new information for sea otter recovery efforts through engaging volunteer support, creating a conceptual planning process, and researching sea otter behavior. These are important and cost-effective steps to recover and protect the southern sea otter population.

3. Project includes a serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.

In Summer 2022 the Conservancy sent letters on the Sea Otter Recovery grant program to tribes within the current range of southern sea otters (San Mateo, Santa Cruz, Monterey, San Luis Obispo, and Santa Barbara counties) and the northern California counties that will be included in the Defenders of Wildlife reintroduction conceptual planning process (Del Norte, Humboldt, Mendocino, Sonoma, Marin counties and the 9-county San Francisco Bay Area counties) to inquire if any Tribes would like to request tribal consultation. The Northern Chumash Tribal Council expressed interest in engaging in sea otter recovery work and Sea Otter Savvy will engage the Tribe in development of outreach materials and invite the Tribe to participate in outreach events as part of the proposed project.

4. Project benefits will be sustainable or resilient over the project lifespan.

Sea Otter Savvy’s direct visitor education, educational stickers, and other outreach will provide benefits over the course of the project and beyond. Both the Defenders of Wildlife conceptual planning project and UCSC’s study of sea otter social behavior will provide information that will be used in sea otter reintroduction efforts now and in the future.

5. Project delivers multiple benefits and significant positive impact.

Recovery of sea otter populations is not only important for the species, but healthy sea otter populations have been shown to benefit a variety of coastal and marine habitats including kelp forests, salt marsh, and sea grass ecosystems. The Sea Otter Savvy outreach program will reduce stress on sea otters and educate the public to view inspire wild sea otters responsibly. Reintroduction of sea otters will promote a healthy ecosystem that may also benefit other wildlife species. The Defenders of Wildlife conceptual planning project will deliver a positive impact by facilitating a collaborative process to move the potential for sea otter reintroduction effort as a recovery action forward. UCSC’s study on social structure and chronic stress will not only be used to inform reintroduction efforts, but will be useful for sea otter conservation more broadly.

6. Project planned with meaningful community engagement and broad community support.

The primary purpose of the Sea Otter Savvy project is engagement with people wanting to view southern sea otters, and has evolved over time to collaborate with marine recreation businesses and recreationists in the local communities. Sea Otter Savvy develops outreach materials in multiple languages and media types to reach diverse audiences. The Defenders of Wildlife project will engage stakeholders including fisheries groups and Tribal nations in creation of the Conceptual Plan to ensure their meaningful engagement in determining next steps that are needed to evaluate sea otter reintroduction as a recovery action. Support for the projects come from Assemblymember Mark Stone, U.S. Fish and Wildlife Service, CA Department of Fish and Wildlife, Monterey Bay Aquarium, and others (Exhibit 3).

PROJECT FINANCING

Coastal Conservancy	\$272,540
Defenders of Wildlife	\$4,000
Monterey Bay Aquarium	\$4,000
Elakha Alliance	\$2,000
Seattle Aquarium	\$2,000
Aquarium of the Pacific	\$2,000
US Fish and Wildlife Service	\$35,000
Oiled Wildlife Care Network	\$14,959
Project Total	\$336,499

The anticipated source of Conservancy funds for the proposed project is an appropriation from the California Sea Otter Fund. Established in 2006, the California Sea Otter Fund is a state income tax check-off program allowing taxpayers to dedicate funds to facilitate sea otter recovery (Revenue and Taxation Code (RTC) Section 18754). The funds may be used for “research, science, protection projects or programs related to the Federal Sea Otter Recovery Plan or improving the nearshore ocean ecosystem, including, but not limited to, program activities to reduce sea otter mortality” (RTC Section 18754.2(a)(3)). The proposed authorization is consistent with the requirements of the California Sea Otter Fund in that funds will be used to further the objectives of the Final Revised Federal Southern Sea Otter Recovery Plan (2003).

RTC Section 18754.2(b) requires the Conservancy to solicit available federal, private, matching, and other dollars to maximize or leverage funds benefitting sea otters. Consistent with this section, the Conservancy has solicited funds from the organizations listed in the table above. In addition, in-kind contributions are estimated at \$80,000 from Defenders of Wildlife. In-kind contributions to the Sea Otter Savvy program are not quantified, but include staff time from the programs advisors including U.S. Fish and Wildlife Service, CA Department of Fish and Wildlife, Monterey Bay Aquarium, and U.S. Geological Survey.

Unless specifically identified as “Required Match,” the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project is consistent with Division 21, Chapter 5.5 (Integrated Coastal and Marine Resources) of the Conservancy’s enabling legislation (Public Resources Code § 31220). Under Section 31220 of the Public Resources Code, the Conservancy may award grants for living marine resource protection and restoration projects in order to improve and protect coastal and marine water quality and habitats. As keystone predators, sea otters have been shown to benefit a variety of coastal and marine habitats including kelp forests, salt marsh, and sea grass ecosystems.

Section 31220 states that a project must meet any of the objectives specified in subsection (b) of that section. The Sea Otter Savvy project is consistent with Section 31220(b)(7), as the project “[r]educes the impact of population and economic pressures on coastal and marine resources.” The proposed project will reduce stress on sea otters (a marine resource) by reducing conflicts between otters and humans. Both the proposed Defenders of Wildlife and UCSC projects will be used to inform sea otter reintroduction planning. Reintroduction of sea otters is proposed as a strategy to expand the species range and is consistent with Section 31220(b)(3) “[r]educes threats to coastal and marine fish and wildlife”. Sea otters are threatened currently due to their limited range extent as sea otters are at carrying capacity in their current range, thus to increase their population numbers out of their Threatened

endangered species status, they will need to increase their range. Additionally, range expansion reduces the threat of a catastrophic disaster such as an oil spill, by expanding their range so not all of the population would be affected by such an event.

Section 31220(c) requires projects funded pursuant to the section to include a monitoring and evaluation component. Defenders of Wildlife will include monitoring and evaluation as a component to the proposed conceptual planning for sea otter reintroduction. A monitoring and evaluation component would not be relevant to Sea Otter Savvy's education and outreach program because the project will not have a direct physical impact that can be monitored. Funded outside of the proposed project, Sea Otter Savvy's citizen science program monitors and evaluates the effects of marine recreation on sea otter activity and behavior to complement and inform their outreach and education efforts. The UCSC proposed project includes monitoring and evaluation component as it is research monitoring sea otters and evaluating their social dynamics and stress response.

Consistent with Section 31220(a), the Conservancy will consult with the State Water Resources Control Board to ensure consistency with Chapter 3 of Division 20.4 of the Public Resources Code.

CONSISTENCY WITH CONSERVANCY'S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 6, Objective H** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will result in three grants that will support the recovery of the southern sea otter.

CEQA COMPLIANCE:

The Defenders of Wildlife project is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Title 14 California Code of Regulations (CCR) section 15262, as it involves only conceptual planning for possible future actions related to sea otter reintroduction which have not yet been approved, adopted, or funded by the Conservancy. Consistent with Section 15262, the project will consider environmental factors in the plan development.

The Sea Otter Savvy educational program is categorically exempt from the provisions of CEQA pursuant to Title 14 CCR section 15322 (Educational or Training Programs Involving No Physical Changes), which exempts the "adoption, alteration, or termination of educational or training programs which involve no physical alteration in the area affected." Implementation of the proposed outreach and public education campaign concerning responsible viewing of wild sea otters does not involve the physical alteration of the environment.

The UCSC project is categorically exempt from the provisions of CEQA pursuant to Title 14 CCR section 15306 (Information Collection), which exempts the "basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource." As part of the proposed project, sea otters will be captured, sedated, assessed for body-condition, sampled, flipper-tagged, and released.

Captures will cause only temporary, minor disturbance to sea otters. Assessing, sampling, and flipper tagging are minimally invasive and is considered to be extremely routine, as hundreds of sea otters range-wide have been flipper tagged with no ill effects. The remainder of the proposed study will include only observational study, monitoring sea otters visually from a distance which will cause no disturbance.

Upon approval of the project, Conservancy staff will file a Notice of Exemption.