



MARINE MAMMAL COMMISSION

17 January 2025

Mr. Drew Crane, Deputy Assistant Regional Director
Ecological Services
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503-6199

Re: Permit Application No. 12241375
(Seattle Aquarium)

Dear Mr. Crane:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (MMPA). The Seattle Aquarium is proposing to conduct research on northern sea otters in Washington State during a five-year period. The purpose of the research is to investigate sea otter abundance and distribution. Researchers would use unmanned aircraft systems (UAS) to survey and photograph/video individuals of any age class and either sex. The Seattle Aquarium would implement various measures to minimize impacts on target and non-target marine mammals.

Personnel qualifications

According to the application, Ms. Olsen would be authorized as the drone pilot in command, however, neither the description of her experience nor her curriculum vitae (CV) describe her experience operating¹ UAS. Information that demonstrates personnel experience and expertise to perform the duties they would be authorized to conduct is required in the application and is essential to accurately assess their ability to conduct specific procedures unsupervised. The Commission recommends that the U.S. Fish and Wildlife Service ensure that all applicants adequately describe their experience with the specific activities they would be authorized to conduct in their application documentation and only authorize Ms. Olsen as the drone pilot in command if she has sufficient experience operating UAS.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA. Please contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas".

Peter O. Thomas, Ph.D.,
Executive Director

¹ Ms. Olsen's CV does state that she has a Part 107 drone pilot license, which is a requirement for authorized drone pilots, however, it does not require flight hours to obtain.