11/8/01

OPENING STATEMENT OF CONCERN BY MEMBERS OF THE BOTTLENOSE DOLPHIN TAKE REDUCTION TEAM

WE, the undersigned members of the Atlantic Bottlenose Dolphin Take Reduction Team (BNDTRT) attend the first TRT meeting (Nov 6-8, 2001, Va Beach, VA) with the following reservations:

In our opinion, the Secretary of Commerce is being forced to prematurely convene this TRT under threat of litigation by the Human Society of the United States.

The NMFS/OPR has not reviewed the "depleted" status of the population since 1993, despite having additional information indicating the existence of substantially more animals.

The BND population surveys provided to the TRT are negatively biased, outdated, spatially incomplete, and contain no estimation of G(o).

Genetic information used to determine stock structure and distribution of the coastal ecotype is severely limited in scope.

The stock assessment, structure, and mortality extrapolation methodologies and assumptions have not been fully peer reviewed. These components should be reviewed by an independent entity such as Dr. Ray Hilborn, the Natural Resources Consultants, Inc., (Seattle, WA), or the National Academy of Sciences.

We have not been afforded an opportunity to review a copy of the NMFS/OPR "Bottlenose Dolphin Conservation Plan".

We have not been afforded an opportunity to review the original NMFS Observer Reports for trips with observed BND interactions.

Despite ongoing efforts, cooperative field research involving reflective gillnets has not been started.

In our opinion, NMFS/OPR has prematurely and inappropriately advocated for elimination of gillnets within 3.0 km of the shoreline.

Only 76% of the PBR generated from the summer surveys for the three northern stocks of BND is currently allocated. We will require 100% allocation of the PBR in this process.

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