February 2, 2008

Mr. John Oliver
Acting Assistant Administrator
National Marine Fisheries Service
SSMC3, 14th Floor, Room 14743
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Oliver:

The following recommendations of the Atlantic Scientific Review Group (ASRG) to the National Marine Fisheries Service resulted from our 8-10 January 2008 meeting in Monterey, California. The group very much appreciated the efforts of Tom Eagle, Richard Merrick, and staff (especially Barbara Newell) in arranging for this meeting. The ASRG has two substantial recommendations that arose from our most recent meeting.

The ASRG strongly recommends that NMFS reevaluate the effects of disproportionate budget cuts in the Southeast Region, the Southeast Fisheries Science Center, and the Marine Mammal Health and Stranding Response Program.

It has come to the attention of the ASRG that the Southeast Region, Southeast Fisheries Science Center, and the Marine Mammal Health and Stranding Response Program will be bearing a large and disproportionate share of the National Marine Fisheries Service’s marine mammal research and management budget cuts for FY 2008. The ASRG has heard estimates that as much as 50% of the agency’s budget shortfall may be in the Southeast Region. This region can ill afford to take significant cuts and still meet its mandates for marine mammal conservation and research. It has the most species listed under the Endangered Species Act. It has the most fishery management councils, the most extractive marine energy activity and the greatest number of marine mammal stocks. Further, it has suffered the largest number of marine mammal strandings and the greatest number of formally-declared marine mammal Unusual Mortality Events.
Proposed cuts will impact a number of key areas, particularly affecting our understanding of the status of, and impacts to, bottlenose dolphin populations. Programs likely to be cut or eliminated include: winter and summer surveys in the Atlantic and Gulf of Mexico for population abundance and distribution and photo-identification and biopsy sampling to define stock structure; a reduction or elimination of stranding response; elimination of collection and analysis of tissue samples used to determine cause of death for marine mammals in the southeast; reduced ability to provide support to Take Reduction Teams and convene congressionally-mandated meetings; and loss of highly trained and experienced contract staff responsible for genetic analysis, stranding response, and field research.

Loss of these programs and services would have devastating effects. Since 2005, hundreds of bottlenose dolphins have died in three separate Unusual Mortality Events (UMEs) in the Gulf of Mexico, and the causes of these events are still under investigation. The effects of these deaths on population abundance have yet to be determined and 2008 surveys are needed to assist in this determination. Further, these UMEs are often related to pathogens or toxins that can also cause harm to fishes, sea turtles, seabirds, and manatees, as well as to humans. Dolphin strandings, and the tissue analysis from the animals, allow us to track ecosystem effects and possible human impacts. Loss of hard-earned capacity for stranding investigations and assessment of dolphin abundance will greatly degrade our ability to evaluate the status of marine mammal stocks as mandated under the Marine Mammal Protection Act (MMPA) and amendments, and to predict and mitigate the impacts of human activities. Equally important as the losses of individual components of stock assessment and impact mitigation programs is the disruption of the integration across programs. The synergistic benefits of information flow as the programs matured greatly expedited investigations and the agency’s ability to provide mandated assessments and protections.

Several stocks of coastal bottlenose dolphins are subject to a Take Reduction Team. To minimize impact on fisheries from take reduction mandates under the MMPA, it is crucial to have an understanding of stock abundance and trends to properly assign Potential Biological Removal levels to stocks, against which fishery impacts can be measured. Further, it is critical to understand stock structure to assure that only those fisheries interacting with animals are affected by management measures. Robust observer programs are key to monitoring levels of mortality and success of management measures. Gear research helps identify the most effective and least economically burdensome measures for reducing bycatch mortality. With the projected program cuts, our ability to understand the need for, and success of, fishery
management measures is greatly compromised and could lead to the agency failing to meet MMPA mandates.

While NOAA/NMFS scientists do excellent work, the credibility of NOAA's science will be severely undermined in the Southeast Region. Thus, we strongly urge you to maintain funding to these critical programs.

The ASRG also recommends that separate SARs be developed for each stock of each beaked whale species for 2009. This will more closely meet the stock assessment guidelines and will make more evident the information gaps for a group of species that is at great risk due to human-caused acoustic-related mortality, as seen in mass strandings associated with naval exercises.

The ASRG commends the national and regional staffs of NMFS for well-developed presentations on a wide range of studies and analyses. We also greatly appreciate the quality and timely delivery of the 2008 SAR drafts for our review. In particular, we commend Karin Forney for organizing the logistics for the joint SRG meeting and Tom Eagle for developing and conducting a valuable conference to address common concerns.

Thank you for your attention to our concerns.

Respectfully submitted,

Donald M. Baltz, PhD
Chair

c: Conrad C. Lautenbacher, Jr.
Vice Admiral, U.S. Navy (Ret.)
Undersecretary of Commerce for Oceans and Atmosphere and NOAA Administrator

Roy Crabtree, Ph.D.
Regional Administrator
Southeast Region