

Reviewer 4 Comments

June 22, 2010

Status Review Document (note: NMFS requested that Reviewer 4 solely review Appendix B (PVA), however, at a glance, the reviewer made the following comments on the Status Review itself)

The Status Review document did come through just fine. I took a look at it, and think it only fair to tell you that I did not especially like what I saw. I do not approve of these expert opinion seances, and I do not think that is in any way "best science."

Nevertheless, given the small amount of substantive information (evidence that this is a DPS, evidence of the very small size of the population, and some indication of population decline), in an otherwise grossly padded document, I think the conclusion of "high risk of extinction" is warranted based on available information.

In that light, the formality of a PVA is largely irrelevant.

PVA Review (See also edited pva):

I have read the PVA appendix. The PVA concludes that there is a high risk of extinction for this population. I concur with that conclusion. Simple inspection of the small amount of available applicable data leads to the obvious conclusion that this population is toast unless something changes for the better.

No amount of legitimate PVA modeling, with just these data, will lead to any other conclusion. I wonder at the agency strategy of indulging in the peculiar overkill of trying to model 44 different sets of assumptions with so little data, when the conclusion is obvious prima facie. I worry that all the unnecessary speculative detail just provides opportunities for unnecessary nit-picking arguments, which might add to the burden of the decision process.

I think the 2-rate model definitely should be dropped from the analysis. My reasons are explained in my comments in track changes on p5 in the attached copy of the draft. I have also made editorial comments throughout, especially in the Introduction.