



# MARINE MAMMAL COMMISSION

23 August 2017

Ms. Chelsey Young  
Office of Protected Resources (F/PR3)  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910

ATTN: Taiwanese humpback dolphin proposed rule

Dear Ms. Young:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the National Marine Fisheries Service's (NMFS) request for comments on the proposed rule (82 Fed. Reg. 28802) to list the Taiwanese humpback dolphin (*Sousa chinensis taiwanensis*) as an endangered species under the Endangered Species Act (ESA) of 1973 along with the accompanying status review report prepared by NMFS.

In its letter of 11 July 2016, the Commission concurred with NMFS's 90-day finding that listing the Taiwanese humpback dolphin under the ESA may be warranted and recommended that NMFS proceed with a status review. After reviewing the proposed listing rule and the accompanying status review report, the Commission agrees with NMFS's proposed determination that the Taiwanese humpback dolphin has a high risk of extinction throughout its range and warrants listing as an endangered species. The summary of factors supporting this conclusion refers to the critically small size of this population, with fewer than 100 individuals, its restricted range in the shallow waters off the western coast of Taiwan, and the subspecies' characteristics that make it vulnerable to various threats. In particular, the Commission agrees that "habitat destruction, modification, or curtailment of the subspecies' habitat or range (e.g., land reclamation, fresh water diversion, and pollution) and other manmade factors (e.g., bycatch and fisheries entanglement and vessel strikes) contribute significantly to the subspecies risk of extinction" and that existing regulatory mechanisms are inadequate to control those and other threats that may emerge as coastal development proceeds in the range of the subspecies.

Therefore, on the basis of the information provided in the proposed rule and the status review report, the Commission concurs with NMFS's proposed determination that the Taiwanese humpback dolphin has a high risk of extinction throughout its range and warrants listing as an endangered species and recommends that NMFS proceed with a final rule to list this subspecies as endangered under the ESA.

Ms. Chelsey Young  
23 August 2017  
Page 2

Please contact me if you have any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style with a large initial "R" and a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.,  
Executive Director