29 April 2026

Mr. Eugenio Piñeiro Soler
Assistant Administrator for NOAA Fisheries
National Marine Fisheries Service
1315 East-West Hwy, Room 14636
Silver Spring, Maryland 20910

Dear Assistant Administrator Piñeiro Soler,

The Marine Mammal Commission (the Commission), in consultation with the Chair of its Committee of Scientific Advisors on Marine Mammals, would like to bring to your attention its concern over the status of the North Pacific gray whale (*Eschrichtius robustus*) population, and alert you to a science symposium it is coordinating to address this concern. I would also like to request a meeting between Commission Chair Frances Gulland and the National Marine Fisheries Service (NMFS) leadership team.

The gray whale is the only living species in its genus and family, the Eschrichtidae. North Pacific gray whales were driven nearly to extinction by commercial whaling in the 19th and early 20th centuries. They were accorded legal protection from commercial whaling by the International Whaling Commission in 1946 and from other harmful human activities in the United States by the Marine Mammal Protection Act in 1972 and the Endangered Species Act (ESA) in 1973. In the mid-1960s, the eastern North Pacific population was increasing in size and continued to do so until the 1990s. The population reached an historical high of approximately 27,000 whales in 1987/1988 and in 1994 became the first whale species to be delisted from the ESA based on population recovery.[1] A western population in Asia has continued to be listed as Endangered.

Since the delisting of the eastern population, estimates have fluctuated considerably, with years marked by low calf production and high numbers of stranded dead whales.[2] [3] The most recent population estimate of 12,900 whales, the lowest since the early 1970s, raises significant concerns

[1] Eguchi, Tomo, Aimée Lang, and David Weller. 2025. Abundance of eastern North Pacific gray whales 2024/2025. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-724. https://doi.org/10.25923/jqea-s505

[2] Lang, Aimée, Tomo Eguchi, and David Weller. 2025. Eastern North Pacific gray whale calf production 1994-2025. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-SWFSC-725. https://doi.org/10.25923/83br-pk61

[3] Raverty, Stephen, Pádraig Duignan, Denise Greig, Jessica L. Huggins, Kathy Burek Huntington, Michael Garner, John Calambokidis et al. Gray whale (*Eschrichtius robustus*) post-mortem findings from December 2018 through 2021 during the Unusual Mortality Event in the Eastern North Pacific. *Plos one* 19, no. 3 (2024): e0295861.

over the conservation status of gray whales[1]. The low estimate was accompanied by very low calving rates in the lagoons of Mexico, and high numbers of emaciated and stranded whales observed along the coastline of North America. This year, many stranded whales have shown clear signs of vessel strikes, malnutrition, or both, raising concerns about encounters with ship traffic and the adequacy of gray whale prey in the North Pacific and Arctic feeding grounds.[4]

The low number of living whales counted and the high number of dead whales observed have attracted considerable media and public attention in Mexico, the United States, and Canada. Research on the gray whale population and its conservation status is ongoing. To examine these issues, the Commission will be coordinating a "Range-wide Gray Whale Science Symposium" to be hosted by the Marine Mammal Institute at Oregon State University, in Newport, Oregon, September 9-10, 2026.

This two-day scientific meeting will focus on gray whale ecology and health across the North Pacific and Arctic. The overarching goal of the symposium is to synthesize current research and observations to improve understanding of recent trends in health, feeding behavior, distribution, and population dynamics, and to identify priorities for future research, monitoring, and coordination. Due to the expertise of NMFS scientists and their leadership in gray whale ecology research and population assessment, the Commission looks forward to the participation of your staff from the Southwest Fisheries Science Center, Alaska Fisheries Science Center, the West Coast Region, and the Protected Resources Division. These experts, together with academics studying gray whale ecology, will be vital to the success of this workshop.

Thank you for supporting NMFS staff in attending the workshop. I suggest we arrange a time for Commission Chair Frances Gulland and I to meet with you and the NMFS leadership team during the upcoming Capitol Hill Ocean Week (June 1-5). This will provide an opportunity to discuss the workshop and other Commission and NMFS priorities. My staff will be in contact to secure a time.

Sincerely,

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

[4] Slaathaug, Josephine M., Rebekah S. Lane, William Keener, Alie Pérez, Moe Flannery, Marc A. Webber, Aalea Grimes et al. Gray whales *(Eschrichtius robustus)* in San Francisco Bay experience high mortality and have limited affiliation to known foraging groups. *Frontiers in Marine Science* 13: 1775666.