

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

26 June 2007

Mr. Christopher Uyeda
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

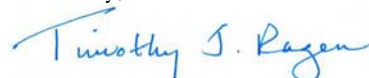
Dear Mr. Uyeda:

Thank you for the opportunity to review the draft summary and evaluation of the five-year review of the southern right whale listing under the Endangered Species Act. The Marine Mammal Commission commends the Service and those individuals who have been involved in preparing this summary. It is an impressively thorough, thoughtful document. Although a few statements and conclusions in the report would benefit from additional support and/or revision, these are relatively minor and do not detract from the justification for the review's most fundamental conclusions. The attached comments include suggestions for minor changes to the summary.

The Commission agrees with the review's conclusion that, at present, no change is needed in the classification of this species as endangered. The report concludes that southern right whales likely consist of several distinct population segments, and recommends a full analysis to identify these possible segments. Although we concur with this conclusion and recommendation, the Marine Mammal Commission recommends that this analysis be deferred to allow the Service's limited staff and resources to be directed toward right whale recovery in the North Pacific and North Atlantic Oceans where populations are at considerably greater risk of extinction. Deferral of the analysis does not appear to compromise recovery actions for the southern populations.

Once again, congratulations on producing such a thorough review, and thank you again for the opportunity to comment on it. If you have any questions on our comments, please call.

Sincerely,



Timothy J. Ragen
Executive Director

Enclosure