



January 22, 2020

Endangered Species Division  
Office of Protected Resources  
National Marine Fisheries Service  
1315 East West Highway  
Silver Spring, MD 20910

Attn: Humpback Whale Critical Habitat Proposed Rule

To Whom it May Concern:

The Petersburg Borough Assembly is highly concerned regarding the proposed rule on critical habitat for the Mexican Distinct Population of Humpback whales. A large portion of the proposed critical habitat area is in Southeast Alaska and has little conservation value to the listed Distinct Population Segments identified in your proposed rule.

The proposed rule states critical habitat may result in changes in state fisheries management which is a significant part of our local economy. Over 90% of our local economy relies on commercial fishing and seafood processing and there are already regulatory requirements that make it difficult and more expensive to support our dominant industry.

We also would like to point out that the Hawaii DPS, whose primary feeding area includes Southeast Alaska, is neither being considered for listing nor designation of critical habitat. Clearly, management and habitat protections already in-place have resulted in a healthy and growing population of humpback whales in SE Alaska. NMFS should look to its own research for evidence of sustaining healthy populations of humpback whales in SE Alaska rather than passing new rules that further restrict economic development in our region.

The Draft Economic Analysis indicates that the largest portion of administrative costs of consultations are anticipated in Southeast Alaska (17-22% of total costs)<sup>1</sup> while NMFS's own research indicates that designation would provide little to no conservation benefit to the Mexico DPS of humpback whales. We request the Secretary of Commerce go beyond the mandatory consideration of impacts and consider that the benefits of excluding Southeast Alaska from the designation outweigh the conservation benefits and will not result in extinction of the species.

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<sup>1</sup> Federal Register, Vol 84. No 196, p 54375.

In short, Southeast Alaska is not the problem, nor is designating critical habitat for less than 2% of the population the solution to maintaining a healthy population of Mexico DPS of Humpback Whales. Our fishermen, seafood processors, marine construction industry, and local communities deserve regulations that support economic development and protection of the environment. This proposed rule does neither.

Sincerely,

Mark Jensen  
Mayor

cc: US Senator Murkowski  
US Senator Sullivan  
US Representative Young  
AK Senator Stedman  
AK Representative Kreiss-Tomkins