



KETCHIKAN GATEWAY BOROUGH

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Office of the Borough Mayor

November 6, 2019

National Marine Fisheries Service
Endangered Species Division Office of Protected Resources
1315 East West Highway (SSMC3)
Silver Spring, MD 20910

Re: Humpback Whale Critical Habitat Proposed Rule

Dear Ms. Manning,

The Ketchikan Gateway Borough has reviewed the proposed designation of critical habitat for Mexico Distinct Population Segment of humpback whales and wishes to submit the following comments.

The Ketchikan Gateway Borough supports the Petersburg Borough's request that NMFS hold a public hearing in Petersburg as part of its information gathering on the proposed critical habitat designation for humpback whales. If a public hearing cannot be held in Petersburg, we ask that the Ketchikan Gateway Borough be considered as an alternate public hearing location.

The Ketchikan Gateway Borough also supports the U.S. Navy's request to exclude from the critical habitat designation the area in and around the Southeast Alaska Acoustic Measurement Facility for national security purposes. The facility is located within the Ketchikan Gateway Borough and is the Navy's sole West Coast asset for measuring high fidelity passive acoustic signatures.

The Borough recognizes that the current effort to designate critical habitat for humpback whales is court-mandated, but is concerned about long-term future economic impacts of this designation. Specifically, the following activities identified that may be potentially impacted:

- Federal fisheries
- Alternative energy development
- In-water construction, including dredging and offshore mining
- Vessel traffic
- Aquaculture
- Military activities
- Water quality management
- U.S. Forest Service timber and forest management activities
- Inland activities, including power plant operations, as well as pesticide and herbicide applications

While no specific regulations have yet been proposed as a result of the draft critical habitat designation, the Borough contends that the current economic activities conducted within the borders of Southeast Alaska are not and do not endanger the Mexico DPS humpback whales and any assertion to the contrary must be validated through vigorous scientific research.

Finally, the Ketchikan Gateway Borough has and continues to advocate that the Federal government reform the Endangered Species Act to mandate that local governments be treated as cooperating agencies when Federal agencies are deciding to list or de-list species as endangered. Without this, municipalities have no meaningful input into the process, which may have profound economic and ecological impacts on the areas where they are located.

Sincerely,



Rodney Dial
Ketchikan Gateway Borough Mayor

CC:

White House Director of Intergovernmental Affairs Doug Hoelscher
U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan
U.S. Congressman Don Young
Petersburg Mayor Mark Jensen