

CARMEL J. ANGELO
Chief Executive Officer
Clerk of the Board



COUNTY OF MENDOCINO
BOARD OF SUPERVISORS

CONTACT INFORMATION
501 Low Gap Road • Room 1010
Ukiah, California 95482
TELEPHONE: (707) 463-4221
FAX: (707) 463-7237
Email: bos@mendocinocounty.org
Web: www.mendocinocounty.org/government/board-of-supervisors

December 10, 2019

Endangered Species Division, Office of Protected Resources
National Marine Fisheries Service
1315 East West Highway (SSMC3)
Silver Spring, MD 20910
Attn: Humpback Whale Critical Habitat Proposed Rule

RE: Proposed Humpback whale critical habitat, West Coast, Mendocino County

Dear Chairperson Somma;

Thank you for the invitation to comment on the National Marine Fisheries Service (NMFS) proposed rule to designate critical habitat for the Mexico, Central American, and Western North Pacific distinct population segments of humpback whales under the Endangered Species Act, including areas off our coast here in Mendocino. In collaboration with colleagues from the Noyo Center for Marine Science, we have reviewed the relevant documents and supporting data and have found the proposal very thorough and well considered. Consequently, the Mendocino County Board of Supervisors would like to express our support for the proposed rule.

The stock of humpback whales that feed along the entire US West Coast, from the Aleutian Islands to Southern California, is currently designated as depleted in the US. Due to a high degree of site fidelity by individual whales to specific feeding areas, the West Coast has been divided into 19 units of critical habitat.

The Mendocino coast is within Unit 15, the California North Coast Area, which includes a humpback whale *Biologically Important Area* from Fort Bragg to Point Arena. Because this is an active upwelling zone, high concentrations of krill and small schooling fish occur throughout this area, justifying the proposed designation. The designation of critical habitat along the west coast also will benefit other baleen whales, including the endangered blue and fin whales that forage on krill and small schooling fish.

There is a strong migratory link between feeding areas in California and Oregon and breeding areas in Central America (Panama to Guatemala), where humpbacks are listed as endangered. Studies show that about 70% of individuals photographically identified in Central America also were identified in California and Oregon. Most humpback whales feeding off the Mendocino coast can therefore be considered endangered. Humpbacks that breed along the coast of Mexico are listed as threatened, and also forage along Northern California.

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Lastly, there is growing evidence from satellite tags and long-term photo-id studies that individual humpback whales prefer smaller home ranges within the overall West Coast Critical Habitat. As large scale climate driven stressors—such as rising ocean temperatures—disrupt the availability and distribution of food sources, this will be more critical to understand. This is an active area of research in our region and along the entire west coast.

Thank you for your recognition of the importance of the Mendocino coast and for your efforts protecting these majestic animals.

Sincerely,

Carre Brown, Chair
Mendocino County Board of Supervisors