

STATE OF ALASKA

OFFICE OF THE GOVERNOR

STATE POLICY DEVELOPMENT AND PLANNING

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June 23, 1980

Commander Frank Harrel
Seventeenth Coast Guard District (m p s)
P.O. Box 3-5000
Juneau, Alaska 99802

State I.D. No. 80040229

Dear Commander Harrel:

The State has reviewed your May 16, 1980 proposals for marine fairways for Prince William Sound and Unimak Pass. The State considers these proposals to be positive measures toward ensuring safe passage of vessels as they transit the areas. The Coast Guard's established vessel traffic SYSTEM (VTS) and traffic separation scheme (TSS) in Prince William Sound extends to Hitchinbrook Entrance. The proposed fairway begins approximately at the end of the TSS and should provide clear marine traffic lanes and separation zones for incoming and outbound tankers as well as protecting this area from other competing uses which might conflict with existing vessel traffic activity.

We also approve of the proposed Unimak Pass fairway. With major oil and gas exploration activities imminent in this region, it is obvious that the density of marine traffic using the Unimak Pass corridor warrants the establishment of a fairway. Since this region produces prodigious quantities of fish which provide income for many fishermen in the State, it is extremely important that measures, such as designating fairways, be taken to protect the area.

Both of the above areas traverse commercial fishing grounds where fixed gear is in place during certain periods of the year. It has been our experience that large vessels passing through strings of pots or long lines nearly always result in gear lost or damaged with attendant economic hardships to fishermen. On the positive side, when vessel corridors are enforced, fishermen will know which areas have a high risk of gear loss and will either avoid the corridor in fishing or accept the loss as part of the cost of doing business in that area. In either case, an element of predictability is gained.

Encl (2)

We offer the following specific recommendations:

1. The statement that "fairways are subject to modification" is disturbing. Could this be interpreted to mean that if oil development mandated a structure within the fairway that it should be realigned? It would, as we indicated in our letter of April 28, 1980, seem self defeating to establish a safe corridor for shipping that could be shifted at will.
2. Prince William Sound. Conflicts with fixed gear, primarily tanner crab pots during the period of November 15 through June 7 and halibut long lines during the periods of May 19 through June 4, July 15 through July 31, August 12 through August 20, and December 9 through December 23 are to be expected north and west of latitude $59^{\circ}29'N$ and longitude $144^{\circ}30'W$. We suggest that the buffer zone between the inbound and outbound lanes be designated a safe area for commercial fishing and that inbound and outbound traffic be strongly encouraged to steer a course as close to the center line of their respective lanes as practical. A note on future charts and in the next edition of the Coast Pilot would be helpful in this regard.
3. Unimak Pass. The proposed fairway corridor passes through the heart of two highly productive king crab fishing areas which produced 440,000 lbs and 1,330,000 lbs respectively during the 1979-80 season. The five-mile wide corridor as proposed would probably result in serious fixed gear conflicts during the period of September 1 through February 30 as it is doubtful that fishermen would voluntarily avoid this area for fishing during the crabbing season.

We suggest the the leg plotted along the rhumb line joining points at:

<u>Latitude</u>	<u>Longitude</u>
54°24'N	165°43'W
and 54°20'N	165°02'W

be dropped in favor of a single ingress-egress to the Bering Sea located farther to the east.

We also suggest that the leg plotted along the rhumb line joining points at:

<u>Latitude</u>	<u>Longitude</u>
54°20'N	165°02'W
and 54°06'N	162°30'W

be aligned in a more NW-SE direction to minimize conflicts with the rich crabbing grounds south of Unimak Bight and the Sanak Islands.

The Department recommends a simple "dog leg" shaped corridor through Unimak Pass lying along the points:

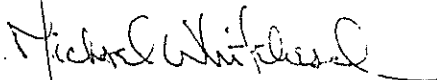
<u>Latitude</u>	<u>Longitude</u>
53°50'N	162°20'W
54°20.2'N	165°00'W
54°35.5'N	165°20'W

*Plan of Unimak Pass
fairway - a sea
along Unimak*

We also recommend either reducing the width of the corridor from 5 miles to 3 miles or adopting 2-mile wide inbound and outbound lanes with a buffer zone separation open to fishing similar to that proposed for Prince William Sound.

We would like to re-emphasize that we support the concept of marine fairways in both of these areas. Our suggested modifications are intended to minimize the expected gear losses and impact upon the existing commercial fisheries, particularly those in the vicinity of Unimak Pass. Should vessel traffic increase to a dangerous level with OCS development in the Bering Sea, we would strongly advocate the establishment of a Vessel Traffic Control system in Unimak Pass similar to that operated by the Coast Guard in Prince William Sound.

Thank you for this opportunity to comment.



Michael Whitehead
State-Federal Coordinator