

CROWLEY®

March 3, 2010

Kaja Brix
Assistant Regional Administrator
Protected Resources Division
Alaska Region NMFS

Attn: Ellen Sebastian

Subject: RIN 0648-XT72

Crowley Maritime Corporation conducts extensive business activities in Alaska, ranging from tug escort service in Valdez to oil-field support on the North Slope to fuel deliveries throughout central and western Alaska. Crowley operates tugs and barges throughout Cook Inlet in support of these business activities, bringing aviation fuel into the Port of Anchorage for the Elmendorf Air Force base or Anchorage International Airport, or loading fuel products out of the Port of Anchorage or at the Tesoro Nikiski dock for delivery to our terminals and/or customers in western Alaska. We operate an assist tug for Tesoro in Cook Inlet specifically to aid barges and tankers in and out of the Nikiski dock and in support of the Cook Inlet oil and gas platforms.

We understand that the National Marine Fisheries Service (NMFS) is proposing to designate more than 3,000 square miles of Cook Inlet as critical habitat for the beluga whales, including the entire upper half of Cook Inlet, the mid-Inlet, all of the Inlet's western shores and Kachemak Bay.

Our operations are closely regulated by the United States Coast Guard, the Environmental Protection Agency and the Alaska Department of Environmental Conservation. We hold safety and environmental protection as our highest corporate values and we are proud to be in full compliance with all regulations. However, Crowley is concerned that such a wide-ranging designation of critical habitat under the Endangered Species Act (ESA) may impact the safe and efficient operation of our vessels, thus having a direct economic impact on both Crowley and our customers. Already, there is a general belief that Alaskans pay too high a price for fuel products. Any further restrictions on our operation would only add to the burden.

Scientists have concluded that the sole cause for the population decline of beluga whales in Cook Inlet was the unsustainable subsistence harvest of the 1990s. In fact, NMFS has not identified any community or economic development activity that has impeded the recovery of the whales or led to the population decline. The ESA requires economic effects to be taken into account for critical habitat designations and, in our view, the proposed critical habitat designation will likely have a significant economic impact on the Cook Inlet region and on Alaska in general without clear corresponding benefits to beluga whales. We urge NMFS to conduct further economic analysis before finalizing any critical habitat designation.

Sincerely,



Robert E Cox
Vice President