



March 3, 2010

Ms. Kaja Brix
Assistant Regional Administrator, Protected Resources Division
Alaska Region, National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802
Attention: Ellen Sebastian **Re: RIN 0648-XT72**

Dear Ms. Brix,

The Port of Tacoma is writing to express its concern about the potential designation of Cooke Inlet as critical habitat for the beluga whale. We share the Agency's desire to protect the beluga; however, we believe there are other avenues to pursue that would lead to greater protection for the species that would not have the same adverse effect on commerce and national security as would result from the critical habitat designation currently suggested.

The Port of Tacoma and the Port of Anchorage share a bond of commerce and mutual support for each others' communities that spans more than 150 years. Seventy percent of the basic consumer goods that Alaskans depended upon are transported through the Port of Tacoma; these goods are carried to Alaska by our customers, TOTE and Horizon Line. This interstate trade provides much-needed family wage jobs for both states. Any restrictions on marine-facilitated commerce to Alaska affect not only Alaskans but hundreds of jobs in Washington State.

Perhaps more significantly, however, is the role both ports play as strategic military seaports. This designation, which Anchorage and Tacoma share with only seventeen other U.S. ports, is recognition of the vital role our ports play in our country's national security. The designation for the Port of Anchorage is based upon it playing a critical role in the deployment of U.S. Armed Forces, including units based at Fort Richardson and other military installations in Alaska. As National Strategic Ports, the two ports require an unimpeded marine transportation corridor between them.

It is our understanding that the Port of Anchorage already spends between \$5 – 10 million annually on efforts to protect the beluga, including posting whale watchers and voluntarily suspending operations if a whale is sighted. Additionally, ocean carriers Horizon Line and TOTE have an unblemished record of safety and risk avoidance and have no record of a beluga whale strike.

Once again, we share your Agency's desire to protect the beluga and other critical species; however, we respectfully ask that you consider the full range of possibilities for protection before instituting such extreme restrictions as those associated with critical habitat designation.

Thank you for your time, and please don't hesitate to me directly if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Wolfe".

John Wolfe
Interim Executive Director
Port of Tacoma