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March 30, 2002

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Carol Bernthal, Superintendent
Olympic Coast National Marine Sanctuary
138 West First Avenue
Port Angeles, WA 98362

Subj: Comments on Report and Recommendations of the West Coast
Offshore Vessel Traffic Risk Management Project

Dear Ms. Bernthal:

The Olympic Coast National Marine Sanctuary Advisory Council is pleased to comment on the Report and Recommendations of the West Coast Offshore Vessel Traffic Risk Management Project. We ask that you forward on our comments to Ms. Jean Cameron of the Pacific States/British Columbia Oil Spill Task Force. The extensive work completed by the project workgroup has produced much valuable information and identified several serious areas of risk.

While supporting the report, we recommend more emphasis on the following recommendations to address areas of special concern to the Sanctuary:

“Investigate dedicated/stand-by tug/regulatory alternatives.”

The Advisory Council believes that oil spills from tankers, tank barges, cargo vessels and large fishing vessels form the greatest single risk from the Columbia River to the north end of Vancouver Island. Please refer to the enclosed letter from the Advisory Council to the Washington State Legislature, supporting a tug at Neah Bay.

“Expand the Western States Petroleum Association (WSPA) and the American Waterways (AWO) Agreements.”

Olympic Coast National Marine Sanctuary

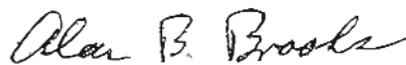
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Most tankers are not covered by the WSPA Agreement. It would be helpful to have information on the number of tankers not covered to illustrate the risk and need for universal compliance. We recommend the Task Force gather that information as soon as possible and add it to the report.

In addition, the Advisory Council supports Minimum Distance Offshore Proposal #1: “25 nm voluntary minimum distance for entire coast and show Higher Risk areas on charts and publications.” In any case, display of minimum distance offshore on the charts is essential to the effective implementation of either proposal. For clarification, we understand that this recommendation applies to tankers, tank barges, cargo, passenger vessels, and fish vessels in transit 300 gross tons and larger.

The Sanctuary Advisory Council thanks the workgroup for the opportunity to comment on your report.

Sincerely

A handwritten signature in cursive script that reads "Alan B. Brooks".

Alan Brooks
Chair

Enclosure

The views expressed are those of the Olympic Coast National Marine Sanctuary Advisory Council and do not necessarily reflect the position of the Olympic Coast National Marine Sanctuary and/or the National Oceanic and Atmospheric Administration.