

Appendix A - Public Comments

The Coast Guard received comments from 29 different entities during the open comment period. Comments not relating to PARS have been omitted. All of the related comments were reviewed and considered during the course of the study. Many commenters made similar statements or raised similar concerns and questions in their submissions. These duplicate comments have not been repeated below. The full text of all comments associated with the PARS is available at www.Regulations.gov and search for docket number "USCG-2014-0941".

Comments regarding risks associated with vessels:

As vessel traffic increases in the region the risk of accidents in the form of oil spills, hazardous material releases, groundings, collisions, noise pollution and mammal strikes also increases.	The Coast Guard agrees that an increase in vessel activity brings an increased probability of a vessel born accident.
As has already happened, a disabled vessel could drift ashore posing a significant environmental threat to the area.	The Coast Guard agrees that a disabled vessel is at risk of drifting with the winds and currents and if not stabilized does pose a risk to the study area.
An oil spill or hazardous material release along the route would be very difficult to clean up, given the remoteness, lack of infrastructure and icy conditions.	The Coast Guard agrees that an oil spill or hazardous material release in the study area would be difficult to clean because of the climate, infrastructure and remoteness.
An oil spill has been identified as the most significant threat from vessels.	The Coast Guard feels an oil spill or hazardous material release is the most likely environmental threat facing the area being studied.
The IMO considers reduced speed as an effective means of reducing underwater noise in its voluntary "Guidelines for the Reduction of Underwater Noise from Commercial Shipping to Address Adverse Impacts on Marine Life" cites speed as an effective	As a Member State of the International Maritime Organization (IMO) the Coast Guard encourages vessel operators to follow the voluntary guidelines established by the IMO, which includes those established to reduce underwater noise.
Scientific research and local observations have both shown vessel noise to disturb marine mammals.	The Coast Guard agrees that noise originating from vessels can disturb marine mammals.
The waters in this region are poorly charted.	The Coast Guard agrees that the study area is not as well charted as other portions of the United State's coastline.

Comments of general support or dissatisfaction

<p>The Coast Guard's proposed route is relatively direct, avoids the majority of the critical areas and will improve maritime safety for the region.</p>	<p>The Coast Guard appreciates you taking the time to comment on the Port Access Route Study.</p>
<p>The Coast Guard should include the four proposed precautionary areas in the final study recommendation.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>Animals do not understand traffic routes.</p>	<p>The Coast Guard recognizes that many animals call this area home and are oblivious to vessel routing measures.</p>
<p>Vessel transit data does not support urgent or impending vessel congestion problems in the Bering Strait.</p>	<p>The Coast Guard agrees that the Bering Strait is not presently congested with vessel traffic.</p>
<p>There is no vessel routing scheme for the approximately 4,500 vessels using the great circle route through Unimak pass each year.</p>	<p>Since the Aleutian Islands recently underwent a similar type of traffic analysis led by the State of Alaska that resulted in the creation of Areas-to-be-avoided the Coast Guard has focused its efforts on a study of the Bering and Chukchi Seas due to its greater remoteness, lack of port and response infrastructure and environmental sensitivity.</p>
<p>If the goal is to reduce the risk of collisions why does the Coast Guard's proposed vessel route go through the center of heavily utilized fishing grounds?</p>	<p>In developing the route the Coast Guard looked at historical vessel track data from both fishing vessels and commercial vessels. The Coast Guards proposed route across the southern and central Bering Sea follows very nearly the route currently being used by both fishing vessels and commercial vessels alike as they transit the area.</p>

Comments regarding impacts to subsistence lifestyle

<p>Communities along the proposed route live a subsistence based lifestyle and depend on non-contaminated marine based foods for physical and cultural survival.</p>	<p>The Coast Guard recognizes the importance that locally caught foods have on the lives of those who live in coastal communities.</p>
<p>We oppose all routing studies of the region because vessels impact the communities subsistence food source.</p>	<p>The Coast Guard recognizes the risks that vessels bring certain risks and benefits to the region.</p>

<p>The Coast Guard should consider how large vessel traffic can endanger small vessels.</p>	<p>The Coast Guard recognizes that certain inherent dangers exist when large ocean-going vessels interact with small vessels designed for near coastal use.</p>
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Comments regarding impacts to wildlife and environment

<p>The PARS area is home to the worlds largest marine mammal population as well as an abundant population of polar bears and an estimated 12 million seabirds.</p>	<p>The Coast Guard recognizes that many animals call this area home.</p>
<p>Many endangered species act listed species and designated critical habitat for the ESA listed species are found within the PARS area and within the proposed two-way route.</p>	<p>The Coast Guard recognizes that the study area is home to many endangered and threatened animals.</p>
<p>Bowhead whales, North Pacific right whales and walruses, especially those with calves are susceptible to ship strikes.</p>	<p>The Coast Guard recognizes that some marine mammals are more susceptible than others to ship strikes.</p>
<p>A ship strike to a North Pacific Right Whale is considered a major mortality factor.</p>	<p>The Coast Guard disagrees that ship strikes are a major mortality factor for the North Pacific Right Whale. According to NOAA's Recovery Plan for the North Pacific Right Whale, the impacts from ships on the NPRW population is considered low.</p>
<p>The PARS area covers a region that hosts one of the largest marine mammal migrations in the world, with the spring and fall migrations directly conflicting with the rising number of vessels transiting the same water.</p>	<p>The Coast Guard recognizes that size and significance of the marine mammal populations that migrate through this area and is working toward solutions that balance the competing demands on the area.</p>
<p>The Bering Strait is an important migratory corridor for marine mammals, many of which are endangered or threatened.</p>	<p>The Coast Guard recognizes that many endangered or threatened marine mammals migrate through the area.</p>
<p>Do not establish a route where marine mammals regularly transit and give them navigational right of way when encountered.</p>	<p>The Coast Guard recognizes that many marine mammals call this area home and is working towards finding vessel routing solutions that avoid migratory corridors where reasonably possible.</p>

<p>Compilation of scientific support statements noting when and where whale concentrations will be highest for various species.</p>	<p>The Coast Guard appreciates the detailed statements on whale migrations.</p>
<p>The Coast Guard's proposed route crosses through designated North Pacific Right Whale Critical Habitat. Right Whales are especially susceptible to ship strikes and loosing a single whale represents a serious setback to the survivability of the whale stock.</p>	<p>The Coast Guard is aware the proposed route passes through designated North Pacific Right Whale critical habitat and agrees that loosing a NPRW would be a serious setback to the population. The Coast Guard is working towards finding routing solutions that balance the many competing demands on the area and will avoid critical habitat areas where reasonably possible.</p>
<p>The Coast Guard must plan the vessel route carefully because the region is home to an innumerable amount of wildlife and the largest marine mammal population in the world.</p>	<p>The Coast Guard recognizes the vast amount of land and marine based animals that call this region home.</p>
<p>The Coast Guard has obligations under the Endangered Species Act (ESA), Marine Mammal Protection Act (MMPA) and the Ports and Waterways Safety Act (PWSA) to consider both direct and indirect impacts to wildlife, critical habitat and subsistence hunters.</p>	<p>Prior to taking any federal action the Coast Guard will ensure all requirements under the applicable environmental laws are met.</p>
<p>The Coast Guard's proposal falls short because it does not protect vulnerable places and species.</p>	<p>The Coast Guard's Port Access Route Study is focused on reducing marine casualties and vessel based accidents which will protect the environment and the wildlife therein.</p>
<p>As sea ice diminishes, ice dependent seals have less habitat and are at greater risk of disturbances from vessels. Ice dependent seals, some of which are threatened, use the ice edge for whelping, nursing, molting and feeding.</p>	<p>The Coast Guard recognizes that many marine mammals call this area home and is working towards finding vessel routing solutions that avoid critical habitat where reasonably possible.</p>
<p>Some bird species fly low to the water and could collide with a ship or be affected by the ships lights.</p>	<p>The Coast Guard recognizes that vessel activity brings with it a certain probability of accidents and is working toward solutions that balance the competing demands on the area.</p>

Comments regarding economic impacts

<p>Coastwise cargo carriers play a crucial role in delivering community sustaining freight and transportation services to locations where roads, rail and air services are either not available or impracticable.</p>	<p>The Coast Guard is aware of the importance of coastwise cargo carries and is working towards finding routing solutions that balance the many competing demands on the area and will avoid disruption to established coastwise routes where reasonably possible.</p>
<p>Hundreds of fishing, fish tender, and fish processing vessels ranging in size from 90 -650 feet utilize the Bering Sea and North Pacific Ocean to catch 2 million metric tons of fish, which is 45% of total US commercial landings and valued at 1.1 billion dollars.</p>	<p>The Coast Guard is aware that fishing is an important industry in this area and is working towards finding routing solutions that balance the many competing demands on the area and will avoid established fishing areas where reasonably possible.</p>
<p>Since the collision avoidance regulations (COLREGS) prevent fishing vessels from impeding the passage of a vessel following a traffic lane, the Coast Guard must consider how establishing a deep-draft traffic route through an extensive fishing operation will effect the fishing industry.</p>	<p>The Coast Guard is aware that COLREG Rule 10 precludes a vessel engaged in fishing from impeding the passage of any other vessel following a traffic lane. The Coast Guard is working towards finding routing solutions that balance the many competing demands on the area and will avoid disruption to the fishing vessels to the extent possible.</p>
<p>The Coast Guard should review historical fishing traffic data, the location of fishing grounds, and proximity to assist tugs in an effort to reduce</p>	<p>The Coast Guard appreciates your recommendations and has looked into these items.</p>
<p>Fishing vessels have unique operating routes since they spend the bulk of their at sea time following the target catch and not sailing from or two specific destinations.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>The gear used by fishing vessels restricts their ability to maneuver.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>

Comments regarding applicability of routing measures

<p>The Coast Guard should state the scope and applicability of the route.</p>	<p>The Coast Guard appreciates your comment and will provide a description of the scope and applicability with the study findings.</p>
<p>Coastal tug and barge operations have a unique operational profile that requires voyage flexibility in response to seasonality, ice and weather.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>

Forcing towing vessels to use the same route as fast moving deep-draft traffic creates a safety risk for towing vessels and an undue hardship on the communities that rely on barge services.	The Coast Guard agrees that vessels traveling at different speeds, as well as overtaking situations can increase the probability of an accident, but disagrees that a 4 NM wide route would offer insufficient sea room or excessive traffic congestion to make on overtaking situation an undue risk or hardship.
Traffic separation schemes can reduce accidents and improve efficiency, but should not apply to towing vessels of 300 GRT or less and engaged in domestic service.	The Coast Guard appreciates your comment and will consider it as part of the study.

Comments regarding alterations to the proposed route

The Coast Guard's proposed route should stay 6 nautical miles from shore.	The Coast Guard appreciates your comment and will consider it as part of the study.
The Coast Guard's proposed route should stay 12 nautical miles from shore, wherever possible.	The Coast Guard appreciates your comment and will consider it as part of the study.
The Coast Guard's proposed route should stay the furthers reasonable distance from shore and sensitive areas.	The Coast Guard appreciates your comment and will consider it as part of the study.
The Coast Guard's route should stay at least 12 nautical miles from King Island even if it means altering the northern most leg of the route off of 000 degrees true North.	The Coast Guard appreciates your comment and will consider it as part of the study.
The Coast Guard's route should be further from King Island because of it's cultural and ecological significance.	The Coast Guard appreciates your comment and will consider it as part of the study.
The waters west of King Island are deeper and have better bathymetry for large ships.	The Coast Guard appreciates your comment and will consider it as part of the study.
The Coast Guard is obligated to protect the waters around King Island under Executive Order 21 January 2015.	The Coast Guard appreciates your comment and will consider it as part of the study.
King Island Native Corporation is the landowner of King Island and is the federally recognized tribal entity representing King Island and its 283 shareholders and 651 tribal members.	The Coast Guard appreciates your comment and will consider it as part of the study.
King Island is on the national register of historical places.	The Coast Guard appreciates your comment and will consider it as part of the study.

<p>If the Coast Guard does not move the route further from King Island they should work with the local community to establish additional protections for the island.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study. ATBA's have been added as alternative routing measures to address this concern.</p>
<p>We disagree with the Coast Guard that the only safe vessel heading through the Bering Strait is 000/180 degrees true. We recommend the Coast Guard alter this leg of the route to a North-Northeasterly direction to allow for a wider standoff distance to King Island.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study. Changing the orientation of the route</p>
<p>We disagree with the Coast Guard that human error logic requires a 000/180 degree route through the Bering Strait.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>We disagree with the Coast Guard that a vessel following a 000 route through the Bering Strait that went "dead ship" would drift with the current in a due north direction through the Bering Strait. We believe the currents and winds are variable and a "dead ship" could drift in many possible directions. See enclosed wind and current data that supports our statement.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>We conducted a routing analysis of the area and the results show that the Coast Guard's route is a well balanced and solid option; however, there are other routes that better incorporate ecological and cultural values.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>The Coast Guard should move the route further from the east side of St. Lawrence Island to avoid a subsistence hunting area. This can be accomplished by extending the second leg of the proposed route.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>We recommend moving the southern most leg of the route west so it avoids the North Pacific right whale's designated critical habitat even though doing so would make the route longer and require additional turns.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>The Coast Guards proposed route should be in the deepest water practicable and at least greater than 200 meters.</p>	<p>The Coast Guard agrees that it is generally safest for oceangoing vessels to transit in deep water, but disagrees that the minimum water depth for the proposed route be set at 200 meters.</p>
<p>The southern leg of the proposed route should be moved west to avoid the heavy concentration of fishing activity that occurs north and northwest of Unimak Pass. Doing so would reduce the risk of marine casualties in the region by reducing overall traffic in the area and lessening interactions between fishing vessels and deep-draft traffic.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>

Comments regarding collaboration

<p>In developing the route the Coast Guard should work with local communities and hunter groups because they have extensive knowledge of the area and know how best to protect it.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study</p>
<p>NOAA welcomes the opportunity to assist the Coast Guard with the PARS project by providing geographical information system (GIS) support, US Coast Pilot updates, navigational chart updates or provide institutional knowledge.</p>	<p>The Coast Guard appreciates your comment and the offer to assist.</p>
<p>Establishing a vessel route is a major federal action and requires ESA consultation with NMFS and USFWS. The Coast Guard should begin ESA consultation as early as possible regarding the effects on threatened and endangered species and their habitat.</p>	<p>The Coast Guard appreciates your comment and prior to taking any federal action will ensure all requirements under the applicable environmental laws are met.</p>
<p>The National Park Service is actively engaged in understanding coastal resources and areas with particular environmental sensitivities; we welcome opportunities to collaborate where this information may be helpful.</p>	<p>The Coast Guard appreciates your comment and the offer to assist.</p>
<p>The AWO asks that the Coast Guard work with the AWO's Arctic Navigation work group and the Pacific Region Quality Steering Committee as the PARS moves forward.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study</p>
<p>Prior to implementing PARS the Coast Guard should better understand how vessel routing will impact cetaceans and seal migrations and subsistence hunting in the region.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>The Coast Guard has an obligation to research the environmental impacts of increased shipping and share this information with tribes before making any decisions on shipping routes.</p>	<p>The Coast Guard appreciates your comment and prior to taking any federal action will ensure all requirements under the applicable environmental laws are met.</p>
<p>The Coast Guards proposal does not show bird migratory routes.</p>	<p>The Coast Guard notes your comment and will consider it as part of the study.</p>

Comments regarding miscellaneous items

<p>The Coast Guard should expand the PARS study area to include Unimak Pass since the pass is very narrow and a vessel could strike a marine mammal as they migrate through the pass.</p>	<p>Thank you for the recommendation. The Coast Guard may study this waterway in the future.</p>
<p>The Coast Guard should host meetings for the public to comment on PARS.</p>	<p>In response to the Federal Register notice announcing the Port Access Route Study and an offer to hold public meetings on the topic, the Coast Guard did receive a few requests for public meetings to be held. In response to these requests the Coast Guard did hold public meetings in Juneau, Anchorage, and Nome Alaska prior to the close of the comment period on 18 August 2015.</p>
<p>Many dead and oiled birds are washed up on St. Lawrence island without any know contamination source.</p>	<p>The Coast Guard appreciates your comment and will consider it as part of the study.</p>
<p>The Regulations.gov website is missing the attachment mentioned in the Federal Register notice.</p>	<p>On December 5, 2014 when the Federal Register and www.regulations.gov began noticing the Port Access Route Study publication there should have been a PDF attachment showing a graphic view of the proposed shipping route and new study area. A human error caused this file from being uploaded and available at the stated www.Regulations.gov website. The USCG immediately began efforts to solve this error once it came to our attention and on 08 December 2014 www.regulations.gov was corrected and the PDF attachment was available for download. Three people, including Mr. Bodron, contacted the USCG about this problem and all were provided a copy of the attachment. The Coast Guard does not feel this short lived error precluded anyone from obtaining the information or provide comments on the study.</p>

Comments regarding speed restrictions

<p>The Coast Guard should create 10 knot speed restrictions in key areas to reduce the chances of slow moving marine mammals and their calves from being struck by a vessel.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should work with NOAA to identify locations for vessel speed restrictions and then incorporate them under the authority granted to the Coast Guard by the Ports and Waterways Safety Act (PWSA).</p>	<p>The Coast Guard recognizes that vessel activity brings with it a certain probability of accidents and is working toward solutions that balance the competing demands on the area.</p>

<p>The Coast Guard should implement vessel speed restrictions in the Bering Strait.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should implement vessel speed restrictions from the Anadyr Strait to north of the Bering Strait to protect marine mammals and encourage vessels to transit on the eastern side of St. Lawrence Island.</p>	<p>The Coast Guard recognizes that vessel activity brings with it a certain probability of accidents and is working toward solutions that balance the competing demands on the area.</p>
<p>The Coast Guard should create a 10 knot vessel speed restriction in the Bering Strait and in the North Pacific right whale Critical Habitat Area located in the southern Bering Sea to protect marine mammal migratory corridors as well as the imperiled North Pacific right whale.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>Should the Coast Guard decide not to move the proposed route to outside the North Pacific right Whale Critical Habitat Area, they should implement a 10 knot vessel speed restriction as has been done in the Gulf of Panama to minimize conflicts with whales.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create vessel speed restrictions that are in effect seasonally (April thru July), or when a whale is observed in the area.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>Scientific research and data from actual implemented speed restrictions show that slowing vessel speeds to 10 knots reduces the instances of whale strikes by an estimated 86% and those that are struck have a probability of survival that increases by one-half or greater.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>Bowhead whales and North Pacific right whales are likely susceptible to ship strikes; as traffic increases in the region mandatory speed limits in important areas could go a long way toward preventing ship strikes and other adverse effects such as noise pollution.</p>	<p>The Coast Guard recognizes that vessel activity brings with it a certain probability of accidents and is working toward solutions that balance the competing demands on the area.</p>

Comments regarding ATBA's

<p>The Coast Guard should designate Areas to be Avoided as part of PARS to keep vessels clear of particularly sensitive or important areas.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
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<p>The Coast Guard should designate a portion of the Bering Strait as an Area to be Avoided to protect against an accident or spill and maintain a migratory corridor for marine mammals.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create an Area to be Avoided in the Bering Strait and the Anadyr Strait to protect marine mammals and subsistence hunters.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create Areas to be Avoided for King Island, St. Lawrence Island, Nunivak Island, Little Diomed Island, and the Bering Strait.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create an Area to be Avoided around King Island.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create an Area to be Avoided around Little Diomed Island</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create an Area to be Avoided around St. Lawrence Island.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should create an Area to be Avoided around Nunivak Island.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>Before creating any Areas to be avoided the Coast Guard should consider the importance of the many safe and established tug and barge routes along the Alaskan coastline.</p>	<p>The Coast Guard is aware that Areas to be Avoided benefit some waterway users while impeding others and will consider these impacts as part of the Port Access Route Study.</p>
<p>Creating Areas to be Avoided for the purpose of ship routing and to reduce the risk of marine casualties and the resulting environmental damage is in line with both Coast Guard and IMO policies. Examples of Areas to be Avoided for this purpose can be found in the Aleutian Islands, California, Florida, Cuba, Russia and New Zealand.</p>	<p>The Coast Guard is aware that Areas to be Avoided have been successfully implemented for the protection of the environment and may consider them as the Port Access Route Study moves forward.</p>

Comments regarding items in addition to a routing system

<p>The Coast Guard should create a Traffic Separation Scheme (TSS) vice a two-way route because a TSS affords greater safety by separating vessels traveling in opposite directions with a separation zone.</p>	<p>The Coast Guard agrees that a Traffic Separation Scheme offers greater safety but disagrees that a TSS is the best solution to the challenges facing this region.</p>
<p>The Coast Guard should create a regulated navigation area (RNA) and a 10-12 knot speed restriction for all waters within a 15 nautical mile radius of Unimak Island or Ugamak Island to prevent whale strikes in this area.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>The Coast Guard should consider requiring vessels transiting the Arctic to engage in voyage planning such as those required by the IMO Polar Code and the forthcoming Arctic Waterway Safety Committee Best Practices.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>
<p>Because of the extreme difficulty associated with cleaning up a spill in the region the Coast Guard should put particular emphasis on accident prevention and risk reduction for collisions, groundings, and ship failures.</p>	<p>The Coast Guard agrees that preventative measures are of critical importance when it comes to protecting this remote region.</p>
<p>The Coast Guard should go beyond a recommended vessel route and implement a full suite of routing and mitigation measures to enhance vessel safety and preserve the ecological and cultural health of the area.</p>	<p>Via the Port Access Route Study, the Coast Guard is working towards finding suitable protective measures that balance the demands of all waterway users, wildlife and the environment.</p>
<p>A well planned vessel routing system should also have conservation benefits for Endangered Species Act listed and candidate species.</p>	<p>The Coast Guard is actively working towards finding routing solutions that balance the demands of all waterway users, wildlife and the environment.</p>
<p>The Coast Guard should consider a shipboard observer network to observe, report and share the presence of marine mammals in or near the proposed route.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as the Port Access Route Study moves forward.</p>
<p>The region lacks the disaster planning and response resources needed to deal with a vessel related accident. The consequences of an accident could be catastrophic.</p>	<p>The Coast Guard agrees that the region lacks appropriate response equipment to deal with a large environmental disaster.</p>
<p>Nunivak Island is strategically located between the northern and southern half of Alaska making it an ideal location for a seaport or pre-staged response equipment.</p>	<p>Thank you for the recommendation. The Coast Guard will consider this as part of the Port Access Route Study.</p>

<p>The Coast Guard should create no discharge zones.</p>	<p>The Coast Guard recognizes that overboard discharges into the Arctic and Sub-Arctic waters are an environmental concern but will not be addressing this as part of the Port Access Rout Study.</p>
<p>The Coast Guard should work with NOAA, USFWS and the EPA to create no discharge zones around St. Lawrence Island and to the north to protect St. Lawrence Island, the Bering Strait and areas north of there from ocean dumping and pollution. St. Lawrence Island has marine debris regularly washing up on its beaches.</p>	<p>The Coast Guard recognizes that illegal dumping from vessels is a problem, but will not address the issue through the Port Access Rout Study.</p>
<p>The Coast Guard should create a vessel safety communication system</p>	<p>The Coast Guard is actively working towards improving vessel communications and monitoring in the Arctic and Sub-Arctic region.</p>
<p>To prevent whale strikes and shipping accidents the Coast Guard should create a vessel monitoring system capable of monitoring vessels in real time and transmitting critical information such as weather, marine mammal locations, subsistence hunter locations and other information from ship-to-ship and ship-to-shore.</p>	<p>AIS technology is advancing rapidly and the Coast Guard continues to look for more and more ways of using this technology to keep vessels and the environment safe. The 17th Coast Guard district is actively prototyping some of the features you mention and hope to begin using them regularly in the near future.</p>
<p>We encourage the Coast Guard to work with the Marine Exchange of Alaska and others to ensure villages and subsistence hunting vessels along the proposed route have up-to-date AIS equipment as this will allow for real time communications with marine mammal subsistence hunters and large vessel traffic in or near the vicinity of harvest activities.</p>	<p>The Coast Guard agrees that having reliable access to AIS and communications equipment is important for vessel safety and will work with all of our partners to ensure vessels are appropriately equipped.</p>
<p>The Coast Guard should improve coastal AIS coverage under the PARS by installing AIS stations at Nunivak Island, Hooper Bay, Cape Romanzof and Krekatok.</p>	<p>The Coast Guard recognizes that this region does not have complete AIS coverage and is working towards improving it.</p>
<p>We recommend the Coast Guard install a navigation aid on the highest elevation point of King Island.</p>	<p>The Coast Guard recognizes the risks vessels bring to the region and will strongly consider adding navigation aids to King Island if a vessel route is ever implemented.</p>

Comments regarding the Russian Federation

<p>The 17th Coast Guard District should seek State Department authorization to engage in bi-lateral dialogue with their Russian counterparts to share information on the PARS.</p>	<p>The Coast Guard appreciates your comment and understands the importance of dialog with neighboring nations.</p>
<p>The Coast Guard should work with Russia to create a complementary vessel management and response system for both sides of the Bering Sea and Bering Strait.</p>	<p>The Coast Guard appreciates your comment and understands the importance of dialog with neighboring nations.</p>
<p>Cooperation with Russia is essential to obtain a high level of protection for the environment as vessels and marine mammals routinely cross the political boundary shared by the two nations.</p>	<p>The Coast Guard agrees that the best way to protect the entire Arctic and Sub-Arctic region located between the two nations is through mutually beneficial and agreeable policies.</p>

Comments regarding IMO adoption of routing measures

<p>The Coast Guard should pursue IMO adoption of the proposed measures as mandatory routing measures.</p>	<p>At this time, the Coast Guard does not envision making any of the proposals from the study mandatory, whether that be via domestic regulations or international agreements.</p>
<p>Since the United States and the Russian Federation both border the Bering Strait, the Coast Guard should pursue a joint proposal with Russia to the International Maritime Organization for adoption of the proposed routing measures.</p>	<p>If the Coast Guard does decide to seek International Maritime Organization adoption of any findings that may come out of the Port Access Route Study we will work with our Russian Federation counterparts, to the extent possible, to bring forward a mutually agreeable resolution.</p>