



STEP INTO AN ALASKA EXPERIENCE

Native Tlingit Culture,
Unspoiled wilderness,
Alaska-sized adventures

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Alaska Occupational Safety and Health Administration
ATTN: Mitch Wallace, Chief of Consultation and Training
1251 Muldoon Rd., Suite 109
Anchorage, AK 99504

Subject: Application for Permanent Variance for Additional Temporary Labor Camp Standards 8 AAC 61.1040, amended from (a) 29 C.F.R. 1910.142(b)(2), and Window Space Requirement 1910.142(b)(7).

1. Employer Information

- a. Icy Strait Point, LLC
- b. Business Address: 108 Cannery Rd, Hoonah, AK 99829
- c. NAICS: #551114
- d. Number of affected employees: 37 for room size and 42 for window size
- e. Contact Person:
Erica Drahozal, Director of Sustainability
Phone: 907-209-1724
Erica.drahozal@icystraitpoint.com

2. Standard for which variance is requested:

- a. **8 AAC 61.1040. Additional temporary labor camp standards.** (a) 29 C.F.R. 1910.142(b)(2), as amended, is revised to read: "Each room used for sleeping purposes shall contain at least 60 square feet of floor space for each occupant. At least a 7-foot ceiling shall be provided."
- b. **1910.142(b)(7)** – Window space requirement: all living quarters shall be provided with windows totaling not less than one-tenth of the floor area, with at least one-half of each window constructed to open for ventilation.

3. Statement of infeasibility/practicality:

Icy Strait Point (ISP) operates a private cruise ship port in Hoonah, Alaska, located on Chichagof Island. The community is remote, with no road access to any major city or town, making logistical support and workforce recruitment uniquely challenging. When ISP opened in 2004, the business model anticipated a locally sourced workforce of approximately 120 employees. However, since the construction of a cruise ship dock and expanded facilities in 2015, and addition of two gondolas, mountain top operations, and significant visitor infrastructure in 2019, the demand for staff has steadily increased to over 300 during peak

season. Due to the limited labor pool in Hoonah, ISP has invested heavily in seasonal worker housing to meet workforce needs. To date, this includes:

- a. Container housing: 14 rooms constructed at a cost of \$360,000
- b. Initial camp: 9 rooms at a cost of \$200,000
- c. Two additional camps from Alaska oil industry: Relocated and installed at a cost exceeding \$1,850,000, with annual lease payments of \$798,000 and monthly operations of \$25,000
- d. Remodeled permanent building: Added in 2025 to provide 40 beds, at a cost of \$1,500,000, with an additional \$10,000 in monthly operating costs

In summary, fixed costs into housing total over \$3,000,000, with annual expenses over \$1,218,000, to provide 216 beds.

Due to the high cost of additional housing, it is not presently feasible to comply fully with the state amended requirement of 60 square feet per resident (from the federal requirement of 50 square feet). Furthermore, a contractor provided an estimate of \$105,600.00 to increase the window sizes in Camp Maher; however, labor availability may pose a challenge. The result would be 37 employees losing their jobs over room size and/or 42 employees losing their jobs over window size, meaning the shutdown of some of Icy Strait Point's operations. Operations currently provide an economic impact to Hoonah by bringing in over \$15 million per year to this remote village.

Given the financial constraints, substantial existing investments, geographic limitations, contractor availability, and significant economic implications, ISP respectfully requests a variance from the State of Alaska amendment for Additional Temporary Labor Camp Standards 8 AAC 61.1040, and OSHA's Window Space Requirement 1910.142(b)(7). The three camps we are requesting a variance for are currently operating at their intended capacities, which meet and exceed Federal requirements of 50 square feet per bed, and are close to the amended requirement for the State of Alaska:

- e. Camp Yukon:
 - i. 328 Fairweather Lane, Hoonah, AK 99829
 - ii. 105 sq. ft. in double rooms; 15sq. ft. under regulation.
 - iii. Rooms have a ceiling height of 8' 8" a volume of 910 cubic ft.
 - iv. Number of rooms: 24

- f. Camp Turnagain:
 - i. 330 Fairweather Lane, Hoonah, AK 99829
 - ii. 105 sq. ft. in double rooms; 15sq. ft. under regulation.
 - iii. Rooms have a ceiling height of 8' 8" a volume of 910 cubic ft.
 - iv. Number of rooms: 9
- g. Camp Maher:
 - i. 332 Fairweather Lane, Hoonah, AK 99829
 - ii. 116.6 sq. ft. in double rooms; 3.4 sq. ft. under regulation
 - iii. These rooms have a ceiling height of 7'10" for a cubic volume of 1018 cubic ft.
 - iv. Number of rooms: 4 rooms do not meet the required square-footage standard, and 26 rooms have undersized windows.
 - v. 26 rooms with windows at 5.17% of floor space

*Employee notice was posted in each housing unit on September 29, 2025.

4. Proposed alternative means of protection:

- a. Limit these specific housing units to seasonal use only (April – October)
- b. Limit occupancy to 2 persons per room
- c. Will not exceed recommended occupancy from supplier of housing units.
- d. Will meet or exceed Federal recommendations of at least 50 square feet per occupant in sleeping rooms and come close to the Alaska amended requirement of 60 square feet per occupant. In addition, all rooms have a ceiling higher than 7 feet, adding to the air flow space.
 - i. "Each room used for sleeping purposes shall contain at least 50 square feet of floor space for each occupant. At least a 7-foot ceiling shall be provided."
1910.142 - Temporary labor camps. | Occupational Safety and Health Administration
- e. Conduct regular housekeeping inspections and daily sanitation.
- f. Provide common areas, indoor and outdoor
- g. Ensure all rooms have working windows and screens for ventilation
- h. Educate employees in housing on the importance of ventilation and continue to educate all staff twice per year on transmissible illness prevention.
- i. Continue to maintain additional housing specifically for isolation from roommates when employees become ill.



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I certify the information above is accurate and that the proposed measures will provide working conditions at least as safe as those required by the standard.

Thank you for considering this request. We are committed to maintaining a safe and healthy environment for all employees, and we appreciate your collaboration in supporting operations in rural Alaska.

Sincerely,

A handwritten signature in black ink that reads "Erica Drahozal".

Erica Drahozal
Director of Sustainability
Icy Strait Point, LLC
erica.drahozal@icystraitpoint.com
907-209-1724