



June 5, 2017

Rear Admiral Michael R, McAllister, Commander  
United States Coast Guard District 17  
709 West 9<sup>th</sup> Street  
Juneau, Alaska 99801

Attention: Lt Jonathon Dale  
Docket Number- USCG-2017-0289

Dear Admiral McAllister,

As you know, the Oil Pollution Act of 1990 (OPA90) establishes two regional citizens' advisory councils – one representing Cook Inlet (CIRCAC) and another for Prince William Sound. 33 U.S.C. § 2732(d). These councils serve as a formal mechanism for public participation in the oversight of Alaska's oil industry in Southcentral Alaska.

In developing OPA90, Congress established guidelines for selecting voting members of the regional councils to ensure broad representation from the many, varied groups potentially affected by oil industry activities. Consequently, CIRCAC's thirteen Board of Directors represent a specific interest or community, including the Municipality of Anchorage, the cities of Kenai, Homer, Seldovia, and Kodiak, and the Kodiak Island and the Kenai Peninsula Boroughs. Also represented are Alaska Native organizations, the State Chamber of Commerce, environmental, recreational, and commercial fishing groups, and aquaculture associations. CIRCAC's bylaws identify interest group members conforming to OPA 90.

To ensure ongoing compliance with OPA90, CIRCAC must periodically submit an application with the Coast Guard for Recertification and is currently in the public comment period. The Coast Guard is tasked with terminal and tanker oversight and monitoring pursuant to OPA90, and one of its important tasks is to ensure that CIRCAC remains compliant with its statutory obligations.

Unfortunately, recent decisions by CIRCAC's executive director call into question whether CIRCAC is complying with the intent of OPA90.

More specifically, in 2016, CIRCAC's Application provided that the Chamber's seat would be filled by a Chamber representative. But on November 15, 2016, CIRCAC held a board meeting and striped the Chamber of the right to select a member. After a series of correspondence, CIRCAC's Michael Munger wrote to the Chamber and claimed that CIRCAC has the authority to remove the Chamber as a member of CIRCAC.

The Chamber believes removing the Chamber as a member from CIRCAC violates the spirit of OPA90. Congress specifically identified the Chamber as an important voice of the community and expected that the Chamber would play a central role at CIRCAC. The Chamber represents over 80 Alaska tourism-related businesses, which businesses host over one million visitors and contributes \$4.2 billion to the Alaska economy on an annual basis. Historically, the Chamber's representative to CIRCAC routinely consults with the Chamber Board regarding issues under consideration at CIRCAC, and then represents those views at CIRCAC Board meetings. The decision to eliminate the Chamber after 27 years contravenes Congress's intent and undermines the effectiveness of CIRCAC because the Chamber provides important perspective on the broad range of issues affecting the tourism industry in Alaska; a perspective not brought to CIRCAC by any other designated member.

The Chamber respectfully requests that the Coast Guard restore the tourism seat to the Chamber and direct that CIRCAC must honor the member selected by Congress.

Sincerely,

A handwritten signature in blue ink, appearing to read "Curtis W. Thayer".

Curtis W. Thayer  
President & CEO

CC: U.S. Senator Lisa Murkowski  
U.S. Senator Dan Sullivan  
U.S. Congressman Don Young