



*"The mission of the Council is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet."*

October 17, 2014

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Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor, Room W12-140,  
1200 New Jersey Ave., SE  
Washington, DC 20590-0001

**SUBJECT: Docket No. USCG-2013-1006: "Comments on Consumer Price Index Adjustments of Oil Pollution Act of 1990 Limits of Liability-Vessels, Deepwater Ports and Onshore Facilities"**

Dear Sir/Madam:

The Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) submits these comments for consideration by the U.S. Coast Guard/DHS when developing regulations under Title 33 of the U.S. Code and 33 CFR in regards to the Oil Pollution Act of 1990 Limits of Liability for Vessels, Deepwater Ports and Onshore Facilities.

Cook Inlet RCAC is a nonprofit corporation organized exclusively for the oversight, monitoring, assessing and evaluation of oil spill prevention, safety and response plans, terminal and oil tanker operations, and environmental impacts of oil tanker and oil terminal operations in Cook Inlet under the provisions of Section 5002 of the Oil Pollution Act of 1990. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

Cook Inlet RCAC appreciates and supports the U.S. Coast Guard/DHS efforts to adjust the OPA 90 limits of liability to keep up with changing inflation rates and to preserve the requirements and principles of OPA 90. We recognize that until now there has not been a systematic increase as prescribed; however we are confident the proposed changes will correct that.

Therefore we support the proposed limit of liability adjustments. Additionally we are in support of the proposed simplified procedure to make future inflation adjustments to the limits of liability by using the significance threshold and adjustment methodology referenced in the proposed amendment to 33 CFR 138.240.

If you have any questions or wish to discuss this further, I can be reached at (907) 283-7222 or via email at [munger@circc.org](mailto:munger@circc.org).

Sincerely,

FOR

Michael Munger  
Executive Director