

Matthew T. Bell, Jr.
Rear Admiral
United States Coast Guard Commander 17th Coast Guard District

RE: Docket #: USCG-2020-0188 Cook Inlet Regional Citizens Advisory Council
Recertification

Admiral Bell,
North Pacific Fisheries Association (NPFA) is a commercial fishing organization comprised of over 65

members and we are in full support of recertification of the Cook Inlet Regional Citizens Advisory Council (CIRCAC). For 30 years, CIRCAC has been Cook Inlet's most effective organization for promoting programs to prevent spills, enhance safety in both marine transportation and oil facilities operations, and protect Cook Inlet's waters, shorelines, cultural, natural and wildlife resources.

Not only does CIRCAC advocate for better regulatory oversight and safety measures, they contribute concrete solutions on how to achieve those goals. This includes conducting risk assessments, sharing data, developing applicable tools and strategies, evaluating best available technology, engaging the public, and thoroughly reviewing contingency plans and regulations that prioritize prevention while promoting safety. No other organization has focused as much attention for as many years to identifying, assessing, and mitigating risks in this region.

CIRCAC has been proactive in identifying risks and developing recommendations to address them; an example is the recently completed Cook Inlet Pipeline Integrity Assessment. Through this project, a full catalog of Cook Inlet's undersea pipeline system was documented allowing a panel of experts, operators and the public to recommend risk reduction measures before problems arise.

Working with industry, CIRCAC has also been able to achieve the long-term goal of closing the Drift River Oil Terminal on the West side of Cook Inlet at the base of Mt. Redoubt. Drift River posed a significant safety hazard in the event of a natural disaster. Now, that oil is transported via pipeline, greatly reducing unnecessary risk.

CIRCAC's science program provides valuable data about coastal habitats, physical oceanography and oil behavior. Current research will generate new information about how biological debris interacts with oil as it moves through the water column. CIRCAC continues to strengthen oil spill contingency plans and recommend substantive changes to ensure facilities are adequately staffed and that the plans are executable.

NPFA is pleased to see the accomplishments of CIRCAC in the last three years. Including the completion of a multi-year habitat assessment, advocating for the strengthening of oil spill prevention and response regulations and maintaining the Vessels of Opportunity program.

Since its inception, CIRCAC has formed and strengthened partnerships and encouraged consensus decision-making. Through this process, CIRCAC brings a varied group of stakeholders together to create environmental monitoring and oil spill prevention programs to promote safe production and transportation of oil in Cook Inlet.

As a group of stakeholders we strongly urge the U.S. Coast Guard to recertify CIRCAC so that it can continue to build on its work and positively impact the future of the Cook Inlet region.

Sincerely,

Malcolm Milne
President, North Pacific Fisheries Association