



August 21, 2003

Mr. David Kaiser  
Federal Consistency Coordinator  
Coastal Programs Division  
Office of Ocean and Coastal Resource Management; NOAA  
1305 East-West Highway; 11<sup>th</sup> Floor  
Silver Spring, MD 20910

Dear Mr. Kaiser,

I am writing on behalf of the Alaska Municipal League (AML), a voluntary, nonprofit, nonpartisan, statewide organization of over 140 cities, boroughs, and unified municipalities in Alaska, representing over 98 percent of Alaskan residents. AML would like to express deep concern regarding the proposed rule published in the *Federal Register* on June 11, 2003 in which the National Oceanic and Atmospheric Administration (NOAA) proposed changes to sections of the Coastal Zone Management Act (CZMA) Federal Consistency regulations.

As you may know, Alaska has over 33,904 miles (longer than that of all of the rest of the lower 48 states) of shoreline, which has many important uses including subsistence, tourism, and recreation. Through the federal, state, and local partnerships created by the CZMA and the Alaska Coastal Management Program (ACMP), Alaska's cities and boroughs currently participate in the management of Alaska's coastal resources. This opportunity for participation is highly valued and frequently utilized by Alaska's coastal districts and Coastal Resource Service Areas.

The proposed rule would (1) make federal agencies the experts on environmental impacts to a state's coastline; (2) exempt some major oil and gas proposals from state review; and (3) give greater weight to the opinion of federal agencies, thereby eliminating the historical deference given to states. Due to the partnerships inherent in the CZMA and ACMP, these changes would significantly reduce state, and by default local, participation in the management of Alaska's coastal resources. AML members strongly support resource and economic development in the State of Alaska, but do not believe that this development should be at the expense of state and local participation. After all, when it comes to resource development in the State of Alaska, Alaskans are in the best position to determine which proposals are the most economically viable and least beneficial/detrimental to the surrounding communities.

Therefore, AML strongly urges you to withdraw the proposed rule changes. Thank you for your time and consideration.

With best regards,

Kevin Ritchie  
Executive Director  
Alaska Municipal League

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