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June 17, 2020

Rear Admiral Matthew T. Bell  
U.S. Coast Guard Commander, 17<sup>th</sup> Coast Guard District  
Via: Federal Rulemaking Portal

Re: Application for Recertification of Cook Inlet Regional Citizens' Advisory Council,  
Docket Number: USCG-2020-0188

Dear Admiral Bell,

I write this letter in support of the recertification of the Cook Inlet Regional Citizens' Advisory Council (CIRCAC). There is no doubt that CIRCAC meets the requirements of alternative compliance in Section 5002 of the Oil Pollution Act of 1990.

I work for Nuka Research and Planning Group, LLC an environmental consulting firm specializing in oil spill prevention and response. We have been in business since 2004 and have contracted with CIRCAC on oil spill response issues. Before the founding of Nuka Research, I also contracted with CIRCAC as an employee of North Coast Research Group, and as a sole proprietor from 1991. So, I am familiar with the organization going back almost to its inception.

Here is a short list of accomplishments that I can remember off the top of my head:

- CIRCAC has worked with oil industry and agencies to strengthen oil spill prevention and response capacity by reviewing and commenting on oil spill contingency plans for over 30 years.
- CIRCAC participated in the development of the State/Federal contingency plans, including the Alaska Unified Area Plan and the Sub-area Plans for Cook Inlet and Kodiak Island.
- CIRCAC was the initial advocate for and has participated in the development of Geographic Response Strategies throughout the region.
- CIRCAC has led numerous environmental monitoring programs looking at environmental impacts from oil and gas production and transportation in the region. Most of these projects included government and industry partners.
- CIRCAC attends, participates in, and evaluates many oil spill drills.
- Likewise, they play a role in the actual responses to significant oil discharges in their area of operation.
- CIRCAC advocated for using a docking tug at the Nikiski marine terminals and in large part are responsible for the industry chartering a tug for these facilities.

- CIRCAC also advocated for a cross-inlet pipeline to reduce the risk of tank ship incidents from tankers crossing Cook Inlet to deliver oil from Drift River to Nikiski. This pipeline is now operating and there are no cross-inlet tanker transits.
- CIRCAC partially funded and helped raise money for the Cook Inlet Marine Risk Assessment and the Cook Inlet Oil Pipeline Risk Assessment. Both of these efforts were preceded by forums on these topics sponsored by CIRCAC.
- CIRCAC is a founding member of the Cook Inlet Harbor Safety Committee and sits on both the Committee and their Board of Directors.
- CIRCAC has been a big supporter of community response organizations, like the Seldovia Oil Spill Team in my hometown.
- CIRCAC led the development of ice-monitoring cameras to aid in sea ice forecasting in Cook Inlet.
- CIRCAC led the process that brought Shore-Zone coastal habitat mapping to Alaska.
- CIRCAC is funding the development of a logistics/liaison database called Geographic Resource Information Database that can be used in an emergency response to locate/contact supporting resources such as boat, aircraft, lodging, and local communities.
- CIRCAC partially funded, supported the development, and participated in the Potential Places of Refuge plans in Cook Inlet and Kodiak Island.
- CIRCAC funded the development of an oil spill trajectory model for Cook Inlet.
- CIRCAC participated in the Negotiated Rulemaking process that led to the U.S. Coast Guard regulations on Vessel Response Plans.
- CIRCAC initiated the development of the Cook Inlet Marine Firefighting plan and has co-hosted marine firefighting symposiums.

The list goes on, but there can be no doubt that this citizen's organization has done tremendous good in the realm of environmental monitoring and oil spill prevention and response over the 30 years of their existence.

For these reasons, I endorse their recertification.

Best Regards



Tim L Robertson, Principal Consultant

Cc: Cook Inlet Regional Citizen's Advisory Council