



"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."

March 31, 2017

Capt. Joseph B. Loring
Office of Marine Environmental Response Policy
U.S. Coast Guard
Submitted via <http://www.regulations.gov>

RE: Comments on Update to Alternative Planning Criteria (APC) National Guidelines –
DOCKET No. USCG-2016-0437

Dear Captain Loring:

Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet. We have been tracking the proposed Alternative Planning Criteria (APC) National Guidelines as they are relevant to the Western Alaska Captain of the Port (COTP) Zone, which includes Cook Inlet.

Because full compliance with federal regulations is possible in Cook Inlet, we understand that any changes to APC guidelines will not affect either tank or non-tank vessel response planning here. Tankers have for some time operated under an APC in the Western Alaska Captain of the Port Zone, with Cook Inlet explicitly excluded. The proposed guidelines also indicate that APCs may continue to apply only to portions of a COTP Zone where appropriate.

Currently, the system of subareas in Alaska makes the demarcation of Cook Inlet easy for planning purposes. If the subareas are modified, as has been discussed by the Alaska Regional Response Team, we request that the U.S. Coast Guard provide written confirmation that APC will never be a viable option for tank or non-tank vessel operations in Cook Inlet.

If you have any questions or wish to discuss this further, I can be reached at (907) 283-7222 or via email at MikeMunger@circac.org.

Sincerely,


Michael Munger
Executive Director

Cook Inlet Regional Citizens Advisory Council * 8195 Kenai Spur Hwy, Kenai, AK 99611-8033

Phone: (907) 283-7222 * Fax (907) 283-6102

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