



"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."

November 4, 2013

Members

*Alaska State
Chamber of
Commerce*

Michael R. Evans
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

*Alaska Native
Groups*

SUBJECT: Comments on Cook Inlet Pipeline Company Oil Discharge Prevention and Contingency Plan Number 12-CP-2081, Major Amendment

Dear Mr. Evans:

*Environmental
Groups*

The Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) submits these Requests for Additional Information (RFAI) on the Cook Inlet Pipeline (CIPL) Company Oil Discharge Prevention and Contingency Plan (ODPCP) Number 12-CP-2081, Major Amendment. The mission of the Cook Inlet RCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet. We submit this request on behalf of our members.

*Recreational
Groups*

Cook Inlet RCAC has reviewed CIPL's response to the State's RFAI regarding the ADEC RFAI #10 request to provide a reasonable estimate of the timeframe necessary to remove the maximum storage volume of 540,000 barrels of crude oil from the DRT after the Alaska Volcano Observatory condition for Mt. Redoubt goes to Yellow.

*Fishing
Organizations*

The CIPL response assumes "a cumulative best case scenario", but fails to consider loading delays due to compliance with winter guidelines-14 hours could turn into 28 or 36 hrs. Each of these time frames have been encountered during past tanker cargo transfers at the Christy Lee platform. Transit times can vary depending on ice conditions; loading and offloading times can vary due to the USCG winter guidelines. Delays due to ice conditions and tidal currents are a common occurrence during winter operations; therefore it is reasonable to assume delays will continue to be a variable to consider.

City of Kodiak

City of Kenai

Based on the State's RFAI, 540,000 bbls is the basis for our assertion that for a substantial part of the year tanker scheduling (loading, transit, and unloading) will be affected by changing conditions.

City of Seldovia

Cook Inlet RCAC recommends that CIPL provide a tanker schedule more in line with winter operations to better account for variances in conditions that affect loading and transit times.

City of Homer

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

*Kodiak Island
Borough*

Sincerely,

FOR

Michael Munger
Executive Director

*Kenai Peninsula
Borough*

Cc: Graham Wood, Betty Schorr

*Municipality of
Anchorage*