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July 23, 2020

Rear Admiral Matthew T. Bell, Jr.
Seventeenth District Commander (D17)
United States Coast Guard
PO Box 25517
Juneau, AK 99802-5517

DOC Number USCG- 2020-0188

Re: Cook Inlet Regional Citizens' Advisory Council (CIRCAC) Recertification

Dear Admiral Bell:

I am writing in support of recertification of the Cook Inlet Regional Citizens Advisory Council (CIRCAC), under provisions of the Oil Pollution Act of 1990. I serve as the University of New Hampshire (UNH) director of the Center for Spills in the Environmental Hazards (CSE) and the Coastal Response Research Center (CRRC), which is a partnership between UNH and NOAA. The centers (www.crrc.unh.edu) bring together the resources of a research-oriented university and the field expertise of NOAA's Office of Response and Restoration to conduct and oversee basic and applied research, conduct outreach, and encourage strategic partnerships in spill response, assessment, and restoration.

As a member of the CRRC Dispersants Working Group (DWG), CIRCAC brought the perspective that research should include cold-water conditions and improve our ability to evaluate environmental trade-offs of various response options. They participated in the planning stages of our "State-of-the-Science for Dispersant Use (DDO) in Arctic Waters Initiative" by helping select experts to determine the state-of-science (knowns and uncertainties) regarding DDO, as it applies to Arctic waters. Separate expert panels were convened and over the past several years released final documents for the following topics concerning DDO: Efficacy and Effectiveness; Physical Transport and Chemical Behavior; Degradation and Fate; Eco-Toxicity and Sublethal Impacts; and Public Health and Food Safety.

For the past two years, CIRCAC has collaborated with CRRC to research the potential interaction of oil droplets with surface-forming organic aggregates, or marine snow. The study looked at sinking rates of natural marine snow aggregates in lower Cook Inlet and laboratory experiments to study the formation of Marine Oil Snow (MOS). For an earlier study that focused on oil-mineral-aggregates, CIRCAC provided sediments from intertidal mudflats in upper Cook Inlet. For the MOS study, they additionally provided silt collected from bottom deposits in the lower inlet and supported the fieldwork in Cook Inlet and for a pilot project on Portlock and Albatross Banks near Kodiak Island. This MOS research is helping to fill

knowledge gaps following the discovery that a significant percentage of the oil from the 2010 Deepwater Horizon (DWH) blowout reached the seafloor as a result of association with marine snow. Subsequent research suggests that both marine snow and mineral aggregates are significant oil exposure pathways that should be incorporated into oil fate and transport models and included in decisions by oil spill responders.

We at CRRC and CSE appreciate the broad representation that CIRCAC brings from coastal communities and interest groups at risk from oil industry operations. Their interest in basing decisions and recommendations on scientific data benefits the oil spill planning and response community. While CIRCAC has initiated or expanded research projects to address their concerns in Cook Inlet, the results contribute to the larger body of work related to oil spill behavior, transport, fate, and environmental impacts.

CIRCAC has been a valued Partner to our and other organizations and I firmly support their recertification. Thank you for the opportunity to comment.

Sincerely,

Nancy E. Kinner, Ph.D.
University Professor
Professor Civil/Environmental Engineering
UNH Director, Coastal Response Research Center
Director, Center for Spills and Environmental Hazards