



"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."

July 10, 2018

Alaska Department of Environmental Conservation
555 Cordova Street, 2nd Floor
Anchorage, AK 99501
Attn: Shannon Miller
Submitted via email: decsparrplanning@alaska.gov

SUBJECT: Comments on Proposed Changes to Alaska's Planning Structure - Spill Prevention and Response

To whom it may concern:

The mission of the Cook Inlet Regional Citizens Advisory Council (CIRCAC) is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.


We have reviewed the proposed changes to the boundaries and content of the current Alaska Unified Plan and Subarea Contingency Plans to a Regional Contingency Plan (RCP) and Area Contingency Plans (ACP) format.

We find the transition from the former Unified/Sub Area Plan format to the Regional/Area Plan format acceptable and appreciate the level of effort expended to date to make the change. Enclosed are some recommended edits that relate to the transfer of content from the current Unified Plan/Subarea Plans and the description of the new geographic zones (formerly known as subareas). In addition to the enclosed edits, we bring the following considerations regarding the process for making future content changes to both the Area Contingency Plan (ACP) and Regional Contingency Plan (RCP).

- Since part of the purpose of this effort is to align Alaska with national guidelines, we assume that the Area Committees will function in accordance with the USCG's Job Aid on Area Planning which makes clear the importance of involving federal, state, tribal, and local agencies as well as industry and non-governmental organizations residing in or representing potentially affected areas. We look forward to contributing.
- The carefully described process currently in place to update the Unified Plan appears to have been removed. While we understand that new, standing Area Committees will be responsible for updates to the ACPs, we request clarification regarding how content in the RCP will be updated, particularly regarding what types of issues will be brought forth for public comment or trigger tribal consultation.

Thank you for your consideration. If you wish to discuss our concerns or comments further, our Director of Operations may be reached at (907) 283-7222 or via email at SteveCatalano@circac.org.

Sincerely,


Michael Munger
Executive Director

Members

Tourism
Organizations

Alaska Native
Groups

Environmental
Groups

Recreational
Groups

Aquaculture
Associations

Commercial
Fishing
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City of Kodiak

City of Kenai

City of Seldovia

City of Homer

Kodiak Island
Borough

Kenai Peninsula
Borough

Municipality
of Anchorage

REGIONAL CONTINGENCY PLAN

No.	Point of Contact	Organization	Page #	Line #	Specific Wording Change	Rationale for Recommended Change	Severity	Review committee Adjudication
1.	Steve Catalano	CIRCAC	68	RSC paragraph	Add "and the incident action plan" to the end of the paragraph describing the role of the RSC	Provides accurate overarching description of the RSC role applicable for all Areas. Language was previously in Unified Plan.	A	

ARCTIC AND WESTERN ALASKA AREA CONTINGENCY PLAN

No.	Point of Contact	Organization	Page #	Line #	Specific Wording Change	Rationale for Recommended Change	Severity	Review committee Adjudication
2.	Steve Catalano	CIRCAC	88	1 st line of paragraph below CIRCAC contact info	Add "...including spills affecting Kodiak" to the first sentence describing CIRCAC's role	Aligns language with current Kodiak subarea plan which acknowledges Kodiak representation in CIRCAC	S	
3.	Steve Catalano	CIRCAC	All Geographic Zone profiles	1 st page of each	Suggest using descriptions at 18 AAC 75.495 to describe each "geographic zone" as these include federal waters and waters out to the EEZ, rather than just the waters included in municipal/borough jurisdictions	While we appreciate that most of the resources referenced for these zones will necessarily be on land, it is useful to have a clear delineation of Cook Inlet or other areas that aligns with state regulations (particularly regarding in-region equipment requirements or descriptions of areas covered by Alternative Planning Criteria, etc.)	S	
4.								
5.								