



"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."

May 31, 2016

Members

*Alaska State
Chamber of
Commerce*

*Alaska Native
Groups*

*Environmental
Groups*

*Recreational
Groups*

*Aquaculture
Associations*

*Fishing
Organizations*

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

*Kodiak Island
Borough*

*Kenai Peninsula
Borough*

*Municipality
of Anchorage*

Alaska Regional Response Team (ARRT)
Submitted via e-mail to decsparplanning@alaska.gov

RE: Supplemental Comments on Unified Plan, Annex B, Process for Community Outreach

To Whom It May Concern:

Cook Inlet Regional Citizens Advisory Council (RCAC) submits this letter on behalf of our constituents as part of the public comment on the proposed changes to the Unified Plan, Annex B, Process for Community Outreach. This letter supplements our previously submitted comments, in response to the 30-day extension to the public comment period.

Cook Inlet RCAC Mission

Cook Inlet RCAC is a non-profit corporation organized exclusively for the oversight, monitoring, assessing and evaluation of oil spill prevention, safety and response plans, terminal and oil tanker operations, and environmental impacts of oil tanker and oil terminal operations in Cook Inlet under the provisions of Section 5002 of the Oil Pollution Act of 1990. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet. Cook Inlet RCAC's Board consists of 13 member representatives from Cook Inlet communities, as well as Alaska Native groups, commercial fishing, aquaculture, tourism, recreational and environmental interest groups that have a significant stake in the environment and resources at risk from oil production and transportation in the region.

Based on our extended review of the revisions to Annex B, and informed by the Fact Sheet published by ADEC, we have one additional comment for the ARRT's consideration.

Recommendation: Include RCACs in Tribal and Local Government (TLG) group

As noted in our April 6th comment letter, Cook Inlet RCAC does not support the change from a Regional Stakeholder Committee (RSC) to a TLG and Affected Stakeholders Group (ASG). However, every indication from the ARRT and ADEC suggests that there is strong support among On-Scene Coordinators (OSCs) to make this change.

Assuming that the ARRT is determined to move forward with this change, we submit that the ARRT has erroneously assigned the RCACs to the wrong group. The RCACs belong in the TLG, not the ASG.

As we read the proposed revisions to Annex B, Cook Inlet RCAC noted the TLG and ASG do not have equal status in the overall incident response. The information flow and overall connection between the Unified Command and the TLG (Tab A) is more substantive, when compared to the process for the ASG (Tab B). Revisions to Annex B also use different language to describe the formation of each group, with the ASG's activation appearing to be more discretionary. The TLG is afforded a clearer role in providing input on incident priorities and objectives, while the ASG appears to be more of a public outreach mechanism, with less opportunity for two-way dialogue. The TLG language states clearly that the Liaison Officer works as a team to represent the federal, state, and Responsible Party (RP) OSCs, while the ASG language does not.

The RCAC's membership and expertise are much more closely aligned with the TLG as described in the proposed revisions. Page 4 of 7 of the proposed revisions to Annex B describes TLG membership as "...each tribal council leader and mayor (or city manager/council leader), or their designees, from the respective villages or communities that may be affected by the spill incident." Cook Inlet RCAC's membership, listed on the front of this letter, includes the Cities of Kodiak, Kenai, Seldovia, and Homer as well as the Municipality of Anchorage, the Kodiak Island Borough, the Kenai Peninsula Borough, and Alaska Native groups.

As we explained in our April 2016 comment letter, our organizational mission centers around citizen awareness. Given this mission and the fact that our membership includes cities, boroughs, municipalities, and Alaska Native groups, we fit in the TLG and not the ASG.

Cook Inlet RCAC recommends that RCACs should be designated as a participant in the TLG, not the ASG, in the event that the ARRT proceeds with the initiative to dissolve the RSC and replace it with these two groups.

Thank you for considering these comments. Please contact me at 907-283-7222 if you have any questions.

Sincerely,



Mike Munger
Executive Director