



"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."

Members

June 10, 2022

**Tourism
Organizations**

Mike Evans
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

**Alaska Native
Groups**

**Environmental
Groups**

SUBJECT: Comments and request for additional information regarding Harvest Alaska, LLC Cook Inlet Oil Discharge Prevention and Contingency Plan, ADEC Plan #: 17-CP-2081

**Recreational
Groups**

Dear Mr. Evans:

**Aquaculture
Associations**

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the Harvest Alaska, LLC Cook Inlet Oil Discharge Prevention and Contingency Plan (ODPCP). CIRCAC's mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

**Commercial
Fishing
Organizations**

Overall, we find this plan to be thorough and well-written. However, we also believe many areas require some clarification. For example, even though the plan contains a list of acronyms and abbreviations, there is a mix of spelled out words or phrases and acronyms throughout the plan; some places acronyms are used, other places the acronym has been deleted and the spelled out word is used. Another area that is in need of clarification is Section 2.12 Substance Abuse Programs; this section now indicates that, "Harvest Alaska is not participating in any medical monitoring programs. Our operators do not perform work in areas that meet the requirements for Medical Surveillance Programs." It is unclear why this statement was added or what changed operationally to eliminate the need for Harvest Alaska to meet the requirements of 18 AAC 75.007(e).

City of Kodiak

City of Kenai

City of Seldovia

The enclosed comments are intended to support ADEC and the plan holder in ensuring that all content is as clear and current as possible. CIRCAC requests a findings document to be supplied at the end of this plan review.

City of Homer

If you have any questions or wish to discuss this further, our Director of Operations may be contacted at (907) 776-5223 or via email at SteveCatalano@circac.org. I may be reached at (907) 283-7222 or via email at MikeMunger@circac.org.

**Kodiak Island
Borough**

Sincerely,

**Kenai Peninsula
Borough**

Michael Munger
Executive Director

Cc: Graham Wood

**Municipality
of Anchorage**

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

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

www.circac.org