



"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."

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*Kodiak Island
Borough*

*Kenai Peninsula
Borough*

*Municipality
of Anchorage*

July 27, 2021

Laura J. Noland
Planner
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments on Alaska Regional Contingency Plan, Version 2, Public Review Draft, June 2021

Dear Ms. Noland:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits the attached comments on the Alaska Regional Contingency Plan (RCP) that was released for public comment in June.

Our input is based on our organization's extensive experience with Alaska oil spill response planning and policy. We provide these suggestions with the intent to enhance the clarity of the document for response planners and response decision-makers. Additionally, our comments seek to facilitate consistency in the way documents are organized within Alaska and nationally. With this in mind, the enclosed spreadsheet provides a number of suggested areas for improvement. We highlight three of them here:

- The RCP should clearly define the type of content change that warrants a public review, so that changes in policy and substance are not made without that opportunity. We agree that administrative changes should not require a public review. However, there should be clear guidance regarding the type of change that does meet that requirement. Such a definition and its application should err on the side of offering the public a review opportunity. This clarification would eliminate cumbersome review cycles with all proposed changes included in a single review, as was the case for the current public comment period.
- The Regional Stakeholder Committee is a long-standing approach in Alaska that was developed by the Alaskan response community. It is an effective way to bring together a broad array of affected local agencies and other (non-agency) organizations to inform a response. We strongly disagree with the proposed language change that would institute a Multi-agency Coordination group or committee, while familiar to some it is not well defined, has not been used in Alaska for decades, and appears to significantly limit the participants.
- We suggest that future public reviews should not be conducted over the summer. This is a particularly busy time in Alaska and any review required during the summer or early fall should have an extended review period if the timing cannot be altered. While six weeks may be longer than the customary 30-day review period, six weeks in June and July does not facilitate broad public input.

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www.circac.org

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On behalf of our member entities, CIRCAC extends our appreciation for the effort that has gone into the revision of the RCP and we stand ready to work with you to clarify or address our suggestions and concerns. If you have any questions or wish to discuss this further you may contact our Director of Operations at (907)283-7222 or via email at SteveCatalano@circac.org or I can be reached at (907) 283-7222 or via email at MikeMunger@circac.org.

Sincerely,

P.P. 
Michael Munger
Executive Director

Cc: Graham Wood
Commissioner Jason Brune