

# Cook Inlet Regional Citizens Advisory Council

Please find attached Cook Inlet Regional Citizens Advisory Council's comments regarding our comments on the Article 2 Financial Responsibility Dollar Amount Update



*“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 27, 2023

**Tourism Group**

Rebecca Spiegel  
Alaska Department of Environmental Conservation  
Submitted via ADEC public comment portal: <https://dec.alaska.gov/comment/>

**Alaska Native Group**

SUBJECT: Comments on Article 2 Financial Responsibility Dollar Amount Update

Dear Ms. Spiegel:

**Environmental Group**

The Cook Inlet Regional Citizens Advisory Council (CIRCAC) exists to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet. We appreciate the opportunity to comment dated June 6, 2023 on proposed changes to Article 2 of 18 AAC 75 regarding the proof of financial responsibility required by regulated oil facilities and vessels.

**Recreation Group**

CIRCAC supports the increase in financial responsibility dollar amounts at 18 AAC 74.236(c) and 18 AAC 75.270 based on the Consumer Price Index. This minimal, standard increase is fair and an important part of protecting the Alaska public from bearing the cost of oil spills.

**Aquaculture Associations**

While we appreciate the effort to ease administrative burdens on both industry and the state, we oppose the proposals to remove requirements regarding signatures under oath or affirmation at 18 AAC 75.205(c), submittal of originals via certified mail or courier at 18 AAC 75.215(c), and notarized documents at 18 AAC 75.236(c). CIRCAC has supported ADEC’s efforts to transition to the use of digital plan documents as a practical matter and the convenience of all involved, but we also believe the basic procedural steps to ensure the appropriate authorized signatures have been obtained on these important documents – and their timely delivery – should be retained.

**Commercial Fishing Group**

**City of Kodiak**

Further, we propose that ADEC post certificates of proof of financial responsibility and the basis of those determinations on the industry contingency plan webpage. This would further advance transparency and public access to important information about operator compliance and build on ADEC’s efforts in that regard to date.

**City of Kenai**


**City of Seldovia**

Thank you for your attention to these comments. Please do not hesitate to contact our Director of Operations, Steve “Vinnie” Catalano at [Stevecatalano@circac.org](mailto:Stevecatalano@circac.org) or me with any questions at (907) 283-7222 or via email at [Munger@circac.org](mailto:Munger@circac.org).

**City of Homer**

Sincerely,

**Kodiak Island Borough**

  
Michael Munger  
Executive Director

**Kenai Peninsula Borough**

**Municipality of Anchorage**