



"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

Tourism Group

Alaska Native Group

Environmental Group

Recreation Group

Aquaculture Associations

Commercial Fishing Group

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

Kodiak Island Borough

Kenai Peninsula Borough

Municipality of Anchorage

July 10, 2020

Department of Homeland Security
Coast Guard
Submitted via Federal eRulemaking Portal: www.regulations.gov

SUBJECT: Comments in response to Docket No. USCG-2020-0185

Dear Sir or Madam:

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 have reviewed the Notice of Proposed Rule-making (NPRM) issued on May 13, 2020 with this mission in mind, and provide the following comments.

The U.S. Coast Guard has requested an extension to its Information Collection Request (ICR) approval to collect information from the public to maintain the National Response Resource Inventory (RRI). CIRCAC strongly supports this request as being necessary for the proper performance of Departmental functions. We offer the following comments based on the four topic areas suggested in the Federal Register Notice.

1. Practical Utility of the Collection

The RRI is a practical and useful tool for the Coast Guard to maintain a national database of oil spill, salvage, and firefighting response resources as mandated by the Oil Pollution Act of 1990. The RRI also enhances the Coast Guard's oversight of the Oil Spill Removal Organization (OSRO) classification process. The RRI is useful as both a planning and response tool, for agencies and non-agency organizations, consistent with the tiered response system in the U.S. where equipment may be cascaded in from other states or regions for significant incidents.

2. Accuracy of the Estimated Burden of the Collection

In the Supporting Statement submitted by the Coast Guard, the estimated burden of the collection reflects actual expenditures in years past. The time burden and cost associated with entering data into the RRI is grounded in past experience, and in our assessment seems to be accurate. The value of the data collected and maintained through these efforts is very high, and the estimated costs associated with collecting it are comparatively low.

3. Ways to Enhance the Quality, Utility, and Clarity of Information subject to Collection

CIRCAC suggests that the Coast Guard consider enhancing the RRI by updating the database technology platform and creating a portal to allow non-OSROs to access the inventory.

The RRI has been in place since the 1990s. Since then, there have been many advances in online databases and geospatial data management that could enhance the functionality and utility of the RRI. In Cook Inlet, we have collaborated with NOAA and the Alaska Ocean Observing System to develop the Cook Inlet Response Tool,¹ a geospatial data portal that can

¹ <https://portal.aaos.org/cirt>

display multiple data sets, including local spill response equipment inventories. Integration of RRI data into a map-based viewer that allowed planners and responders to overlay OSRO equipment inventories with other data sets could enhance the value of the RRI data. Currently, the RRI can only be accessed by entities who have an account, and the interface for establishing an account contemplates that users would be either a response contractor or government agency. It is not set up for other types of users, although in the past CIRCAC has been able to set up an account to access the data. We suggest that the Coast Guard consider creating a more public-facing interface to allow broader access to OSRO inventories – similar to the Worldwide Response Resource List (WRRL)² maintained by the Washington Department of Ecology.

4. Ways to Minimize the Burden of Collection on Respondents

The Federal Register notice suggests that minimizing the burden on respondents might be achieved through the use of automated collection techniques, and CIRCAC supports the Coast Guard's suggestion to modernize data collection. Updating the underlying technology platform for the RRI might be one solution to reduce the burden of information collection through automation. CIRCAC encourages the Coast Guard to look into the Cook Inlet Response Tool and the Geographic Response Information Database program that we have worked with our partners to develop, as it includes a mechanism to streamline data collection and we would be pleased to provide information about both programs if they are of interest.

Thank you for your attention to these comments. Please do not hesitate to contact me with questions at (907) 283-7222 or via email at MikeMunger@circac.org.

Sincerely,



Michael Munger
Executive Director

² <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Worldwide-Response-Resource-List>