



"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

November 19, 2004

*Alaska State
Chamber of
Commerce*

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street SW., Washington, DC 20590-0001

*Alaska Native
Groups*

Re: Comments on National Preparedness for Response Exercise Program (PREP) triennial exercise schedule for 2005, 2006, and 2007, and PREP guidelines (Coast Guard docket number USCG-2004-19106)

*Environmental
Groups*

To Whom It May Concern:

*Recreational
Groups*

The Cook Inlet Regional Citizens Advisory Council (CIRCAC) is a nonprofit 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, (OPA 90). Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet. CIRCAC consists of 13 members representing boroughs, cities and municipalities in the Cook Inlet region, as well as Alaska Native groups, commercial fishing, and aquaculture, tourism, recreational and environmental interest groups.

*Aquaculture
Associations*

*Fishing
Organizations*

City of Kodiak

The plan holders who operate in Cook Inlet participate in the National Preparedness for Response Exercise Program (PREP) as a means of satisfying the requirement for a response exercise program under the Oil Pollution Act of 1990 (OPA 90). The PREP guidelines are the most prevalent model for exercise planning, development and evaluation in use in the State of Alaska. As an oversight group focused on reducing the risk of oil spills in Cook Inlet, CIRCAC recognizes the importance of ensuring that PREP effectively meets the intent of OPA 90. We are grateful for the opportunity to comment on the PREP Triennial Exercise Schedule for 2005, 2006, and 2007, and the PREP Guidelines.

City of Kenai

City of Seldovia

City of Homer

CIRCAC has reviewed the triennial exercise schedule for 2005-2007 and we have no comments on that schedule; instead, we will focus our comments on the PREP Guidelines. CIRCAC submitted comments on the PREP program during the 2000-2001 review of the PREP Guidelines, in which we highlighted three areas where we believed the PREP program could be improved by revising the Guidelines. The 2002 revision to the guidelines addressed some of our concerns regarding incorporating feedback from lessons learned and the requirement for unannounced exercises. We reiterate parts of those comments today, in hopes that the Coast Guard, the Research and Special Programs Administration, the Environmental Protection Agency and the Minerals

*Kodiak Island
Borough*

*Kenai Peninsula
Borough*

*Municipality of
Anchorage*

Management Service will use this opportunity to further refine and improve on the PREP Guidelines published in 2002.

1. Increase the Number of Unannounced Government-led Exercises.

In Cook Inlet, as in many regions of the United States, we rely on the PREP guidelines to schedule drills and exercises in our region. As a frequent observer of response drills and exercises in Cook Inlet, CIRCAC believes that unannounced drills are a highly effective tool for assuring response readiness. One of the most telling ways to demonstrate readiness is for an operator to respond to an unannounced drill that requires personnel to implement components of their response plan. Unannounced drills have the benefit of surprise, which gives them an element of realism necessary to accurately assess response readiness.

CIRCAC recommends increasing the number of government-initiated unannounced exercises currently listed on page 2-13 of the PREP guidelines. We propose that a 50% increase would be appropriate for the USCG regulated vessels and facilities, so that 6 exercises would be held per area per year. CIRCAC is willing and eager to assist the Coast Guard with the planning, observation and/or evaluation of drills held in the Cook Inlet region.

2. Require Lessons Learned Implementation before Exercise Credit is Given

CIRCAC believes that the implementation of lessons learned is a critical component of the oil spill exercise cycle. Too often, “lessons learned” never move beyond a bullet list in a drill report. It is critical that lessons learned through drills and exercises be incorporated into the response system so that response readiness and capabilities are continually improved. One way to ensure that drill lessons are translated into improvements to response plans and organizational systems is to strengthen the PREP documentation requirements for lessons learned.

CIRCAC recommends that the “Credit for Spill Response” criteria on page 2-23 of the PREP guidelines be expanded. The bullet list for documentation should be expanded to include a final bullet requiring “A schedule of actionable items to be addressed based on lessons learned.” This requirement would ensure that operators take the critical step of translating lessons learned into action items for use in improving the overall response system, and require that they set out a schedule for implementing those improvements before they receive credit for the PREP exercise.

3. Improve Lessons Learned Data Management

Lessons learned provide important information that has value not only to the operator who conducts an exercise, but to other operators who may face similar response challenges. As a frequent drill observer, CIRCAC has noted that many of the same issues arise in exercise after exercise, regardless of the operator. If lessons learned were captured and tracked in a manner that made the

information available to the operators, the public, stakeholder groups, and other agencies, then lessons learned from each PREP exercise would have the potential to benefit a much wider audience.

While we realize that the Coast Guard does compile data from PREP exercises, we do not believe that this information is readily available to operators and the public in its current form. CIRCAC recommends that the Coast Guard improve data management of lessons learned from PREP exercises. CIRCAC has had difficulties accessing the public database at the National Response Center After-Action Information and Lessons Learned Database (<http://www.cgsails.uscg.mil/nrcell/>). Perhaps a more user-friendly system could be developed or periodic reports and/or workshops used to publicize and distribute lessons learned data.

Finally, CIRCAC would like to express our interest in and support for the proposal to hold a workshop to review and discuss the PREP process. Such a workshop would provide a valuable opportunity for operators, regulators, and stakeholder groups to focus on opportunities to continue to improve our national oil spill response system. We encourage the National Schedule Coordination Committee to schedule a workshop, as proposed in the docket, in 2005.
Thank you for the opportunity to comment on the PREP program.

Sincerely,



Michael L. Munger
Executive Director