

Regional Citizens' Advisory Council / "Citizens promoting environmentally safe operation of the Alyeska terminal and associated tankers."

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In Valdez: P.O. Box 3089 / 130 South Meals / Suite 202 / Valdez, Alaska 99686 / (907) 834-5000 / FAX (907) 835-5926

MEMBERS

April 29, 2016

Alaska State
Chamber of Commerce

Hon. Lisa Murkowski
United States Senate
709 Hart Senate Office Bldg.
Washington, D.C. 20510

Hon. Don Young
U.S. House of Representatives
2314 Rayburn House Office Bldg.
Washington, D.C. 20515

Chugach Alaska
Corporation

City of Cordova

Hon. Dan Sullivan
United States Senate
702 Hart Senate Office Bldg.
Washington, D.C. 20510

City of Homer

City of Kodiak

Subject: The critical need for revision by the ARRT of its recently proposed amendment to the Alaska Unified Plan which would represent a serious weakening of public involvement in and the effectiveness of oil spill incident response and clean-up in Alaska

City of Seldovia

City of Seward

Dear Senator Murkowski, Congressman Young and Senator Sullivan:

City of Valdez

This letter is to bring to your attention a matter of serious concern to us as Alaskans and as members of the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) about a recent proposal by the Alaska Regional Response Team (ARRT).

City of Whittier

Community of
Chenega Bay

Our concern is over the ARRT proposed amendment to the Alaska Unified Plan **that would result in a major weakening of the current level of citizen stakeholder involvement with, and effectiveness of, the Unified Command** in responding to and cleaning up a major oil spill in Alaska should another one occur.

Community of
Tatitlek

Cordova District
Fishermen United

Because of our deep concern, which we know you share, about the potential damage that could result in the event of another major spill to Alaska commercial, sport and subsistence fishing, sport and subsistence hunting, other businesses, people, fish, wildlife, and the environment, we respectfully request your help. We seek your support for the Environmental Protection Agency, the U.S. Coast Guard (co-chairs of the ARRT) and the Alaska Department of Environmental Conservation (ADEC) to work with both of Alaska's Regional Citizens' Advisory Councils (the Prince William Sound and Cook Inlet RCACs) and other *Exxon Valdez* oil spill region stakeholders **to remediate, rectify and refine this proposed amendment.** We believe such a rectification is essential to maintaining the many benefits of today's public stakeholder participation in oil spill response while improving, where appropriate and feasible, the process for achieving that critical participation.

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

The proposed amendment as currently presented would (1) eliminate the Regional Stakeholder Committee (RSC) as it has operated successfully over the past decade and substitute in its place two new entities, as well as (2) make other changes that together, in our judgment, **weaken rather than strengthen** the Alaska Unified Plan. If implemented, these changes would **undo much of the progress that has been achieved in terms of the involvement of stakeholders and the public in oil spill response and clean-up preparation since the Exxon Valdez oil spill.**

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

The recently proposed amendment is essentially the same that was provided to the PWSRCAC in 2013. At that time, PWSRCAC sent a letter dated November 5, 2013 (copy enclosed) to ADEC with specific critique of the items in the proposed

amendment that, in the view of the member communities and organizations we represent, signified a **major step backward**. In the three years since then, little has changed in the proposed amendment to improve it from when it was originally proposed.

The ARRT made the proposed amendment available for public comment on March 25, 2016. PWSRCAC will submit its formal comments to the ARRT later this week and will share them with you at that time. PWSRCAC has deep concerns about the content and effect of this amendment, which would substantially reduce the role of (1) the RCACs which, as you know, Congress authorized as one of the means to try to help prevent future major oil spills and to help improve oil spill response and cleanup as well as (2) stakeholder groups, including local and tribal governments.

The proposed changes adversely affect the RSC, the entity through which stakeholder groups are currently provided access to the oil spill command structure for much needed two-way communications during a spill incident. The proposed amendment would eliminate the RSC, and replace it with a much less effective structure and a less transparent process for tribal and local governments, the RCACs and other stakeholders potentially affected by oil spills to serve in constructive roles during an incident response.

Under the existing Unified Plan, the RSC is provided key, timely and essential opportunities for two-way information exchange during an oil spill. The RSC currently has official access to the Unified Command and Command Post to receive direct updates on what is happening during an oil spill response and to provide timely input on stakeholder priorities.

The RSC is also currently provided official access to data about how the spill will be cleaned up, including same-day access to a complete copy of the Incident Action Plan (outlining cleanup activities and priorities). The RSC currently provides an opportunity for people with unique and important local knowledge as well as experts with extensive and critical technical expertise to bring their local knowledge and expertise to bear during an oil spill incident. They also serve the critically important role of communicating questions raised by stakeholders during a spill response and providing informed answers back to citizens and organizations most affected by and at risk from an oil spill.

The proposed changes would split the RSC into two organizations: a Tribal and Local Government (TLG) Group and an Affected Stakeholders (AS) Group. **Neither group, individually or in combination, would have the same level of access the present RSC has today.** In the view of PWSRCAC, **this is the opposite direction in which the Alaska Unified Plan should be going.**

Specifically, a few of the many examples of how the proposed changes would result in **net losses to Alaska's citizens and stakeholders are as follows:**

- The PWSRCAC and other local experts with specific oil spill response expertise would no longer be able to play as active a role as they do currently in representing stakeholders in their area affected by a spill.
- The proposed tribal/local government and stakeholder groups would have **limited access to the Unified Command**, which would make it far more difficult, and uncertain, for stakeholders to convey local knowledge, expertise and concerns directly to the Unified Command, the final decision makers in an incident, in a timely manner so that the input of the citizens can be meaningfully incorporated into an oil spill incident response. It also makes it more difficult for the PWSRCAC to collect timely and factual information about the incident so as to communicate to their member organizations and, in the process, to the public.
- Splitting stakeholders into two groups **reduces the opportunity for collaboration and cooperation among affected stakeholders.** A combined RSC recognizes that some stakeholders transcend municipal or tribal boundaries; it is arbitrary and counter-productive to try to parse out Alaskan stakeholders into sub-groupings. On the contrary, part of the reason the RSC has worked well is the cohesion of the many stakeholders through participating within or with the PWSRCAC.

Attached is a summary table that concisely shows how the proposed changes are detrimental in many respects to the goal of quickly and effectively responding to an oil spill or similar incident. As you know, the Regional Citizens' Advisory Council concept, as conceived of prior to and later incorporated into the Oil Pollution Act of 1990, is to "involve local citizens in the process of preparing, adopting, and revising oil spill contingency plans." The Act states, "only when local citizens are involved in the process will the trust develop that is necessary to change the present system from confrontation to consensus." **We are deeply concerned that the proposed amendment to the Unified Plan will weaken and marginalize citizen involvement in oil spill response and move prevention and response backward** to approaches which contributed to the conditions that led to that devastating *Exxon Valdez* oil spill. Such a move would be, we believe, untenable and a **breach of faith** with the public.

Alaskans unfortunately and, in many instances, tragically, have seen first-hand what can happen when industry, government regulators and the public grow complacent and are not adequately diligent when it comes to oil spill prevention and response. Diligence requires a lot of hard work, including the challenging, but absolutely necessary, task of the Unified Command coordinating closely with those who could be or are being harmed or otherwise adversely affected by an oil spill.

Over the past 27 years, federal and state agencies of government, along with the public and industry, have developed for Alaska one of the best and most effective oil spill prevention and response systems in the world. It is imperative that we all do what we can to keep it that way, improve on it wherever feasible, and not allow it to be weakened as the current proposed amendment would do.

We all have learned from the *Exxon Valdez* oil spill and oil spills in other areas of our nation, such as the Deepwater Horizon spill just a few years ago, that all parties . . . state and federal governments, stakeholders, and the public at large, **can take nothing for granted and therefore must remain vigilant**. We believe that the proposed amendment as it is as of March 25, 2016, while prepared with good intentions, **would represent a major step backward for the public, for businesses, for people, for fish and wildlife, for the marine and terrestrial environment, and for the environment in general**.

Therefore, we strongly recommend:

(1) that the proposed amendment by the ARRT be withdrawn so **that the Regional Stakeholder Committee as constituted remains as it is today** and has been for more than a decade while generally working well; and

(2) that representatives of the EPA, the Coast Guard and ADEC actively engage with the PWSRCAC and other stakeholder representatives in the EVOS region, including representatives of local governments, Alaska Native Tribes and Corporations, the fishing industry, tourism, the state Chamber of Commerce, and non-governmental organizations, so as to refine and improve the coordination between the RSC and the Unified Command while correcting deficiencies in the currently proposed amendment.

Stakeholders of the *Exxon Valdez* oil spill region are deeply appreciative of the great work and dedication that members of the ARRT have shown over the years. The members of the PWSRCAC all stand ready to engage in the process of working constructively to improve the proposed amendment. We feel confident that such an informal process initially can help work out revisions to the amendment for which there would be near-universal support. Once agreement on such revisions can be reached, then the formality of finalizing and approving the amendment would be an appropriate and welcomed next step.

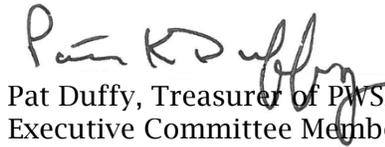
It is crucial for stakeholders and the public to have confidence that whatever changes that may be made to the Unified Plan will result in genuine positive and constructive improvements to the role and work of the current Regional Stakeholder Committee as well as

to the operation of the Unified Command and the Alaska Unified Plan. We will very much appreciate your support and assistance in seeing that such improvements are achieved.

Sincerely,


Donna Schantz
Executive Director


Thane Miller, Vice President of PWSRCAC and Executive Committee Member, Representative from the Prince William Sound Aquaculture Corporation

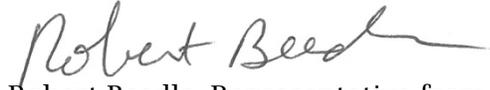

Pat Duffy, Treasurer of PWSRCAC and Executive Committee Member, Representative from the Alaska State Chamber of Commerce


Robert Archibald, Executive Committee Member-at-Large, Representative from the City of Homer


Melissa Berns, Executive Committee Member-at-Large, PWSRCAC Representative from the Kodiak Village Mayors Assn.


Roy Totemoff, PWSRCAC Representative from Tatitlek Corporation and Tatitlek IRA Council


Dorothy Moore, Representative from the City of Valdez


Robert Beedle, Representative from the City of Cordova

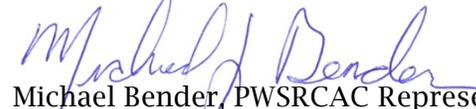

Mako Haggerty, Representative from the Kenai Peninsula Borough


Amanda Bauer, President of PWSRCAC and Executive Committee Member, Representative from the City of Valdez


Bob Shavelson, Secretary of PWSRCAC and Executive Committee Member, Representative from the Oil Spill Region Environmental Coalition


Patience Andersen Faulkner, Executive Committee Member-at-Large, Representative from Cordova District Fishermen United


Al Burch, PWSRCAC Representative from the Kodiak Island Borough


Michael Bender, PWSRCAC Representative from the City of Whittier


Wayne Donaldson, PWSRCAC Representative from the City of Kodiak


Orson Smith, Representative from the City of Seward


Michael Vigil, PWSRCAC Representation from Chenega Corporation and Chenega IRA Council


Alisha Sughroue, Representative from the City of Seldovia

cc: ARRT Co-Chairs and Member Agencies
Hon. Bill Walker, Governor of Alaska

Enclosures: (1) PWSRCAC letter to ADEC official, dated November 5, 2013
(2) Summary table of the effect of some of the proposed changes to the RSC

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MEMBERS November 5, 2013

Alaska State
Chamber of
Commerce

Mr. Dale Gardner
Environmental Program Specialist III
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501

Alaska Wilderness
Recreation & Tourism
Association

Chugach Alaska
Corporation

SUBJECT: Alaska Regional Response Team (ARRT) Proposed Draft Amendment to the Alaska Unified Plan to Eliminate the Regional Stakeholder Committee (RSC)

City of Cordova

City of Homer

Dear Mr. Gardner:

City of Kodiak

This letter responds to your offer at the September 2013 Alaska Regional Response Team (ARRT) meeting to provide the Alaska Department of Environmental Conservation (ADEC) with input on the proposed draft amendment to the Alaska Federal/State Preparedness Plan for Response to Oil & Hazardous Substance Discharges/Releases (Unified Plan). That proposed draft amendment would, if approved and implemented, eliminate the Regional Stakeholder Committee (RSC). At the September 2013 ARRT meeting, the Prince William Sound Regional Citizens' Advisory Council ("PWSRCAC" or "Council") staff advised that this amendment would not likely be supported by the Council and the members it represents.

City of Seldovia

City of Seward

City of Valdez

City of Whittier

Community of
Chenega Bay

PWSRCAC strongly believes that the proposed change would significantly reduce access to information and the Unified Command for most stakeholder groups during an oil spill response and would be a major step backwards that may cause substantial harm to interests of both the public at large and Alaska. The PWSRCAC respectfully recommends, for reasons discussed below, that the proposed amendment be withdrawn and that in lieu of the proposed changes, the ARRT engage with the PWSRCAC and other stakeholders to genuinely improve and strengthen the current RSC process.

Community of
Tatitlek

Cordova District
Fishermen United

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

The Unified Command currently provides the RSC under the Unified Plan:

Oil Spill Region
Environmental
Coalition

- A complete copy of the Incident Action Plan (IAP) on the same day it is produced;
- All information produced by the Joint Information Center (JIC);
- Responses to information or questions raised by the RSC;
- Support for the RSC in carrying out their duties and responsibilities; and,
- Access to the Unified Command within the planning cycle.

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

The ARRT has proposed the following major changes to the Unified Plan:

1. The RSC would be eliminated and replaced with two groups that partition and segregate local governments and Tribes from all other affected stakeholders.
 - a. A Tribal and Local Government (TLG) Group would be formed to include local governments and Tribes and would communicate to the Unified Command through the Liaison Officer. As proposed, the TLG would have direct access to the Unified Command only “when feasible during the course of the response.”
 - b. An Affected Stakeholder (AS) Group would house all other stakeholders, including PWSRCAC, to be “informed” by the Liaison Officer who will “serve as a conduit to the Unified Command for delivering the recommendations or concerns of the group.”
2. The Incident Action Plan (IAP) would no longer be provided to local governments,¹ Tribes, or any other stakeholder, thus reducing access to information for all stakeholders.
3. Joint Information Center (JIC) materials would be provided to local governments and Tribes, but not to any other stakeholders.

PWSRCAC does not support these proposed changes. They would result in less public participation in a response by an overall less-informed public. We therefore recommend that the amendment be withdrawn.

The function and respective roles of the Regional Citizens’ Advisory Councils (RCAC) and the RSC are discussed in individual sections within the Unified Plan. The currently proposed revisions only encompass amendments to the RSC section of the Unified Plan. It is encouraging that the proposed changes do not affect the section in the Unified Plan [Annex B, Appendix II, (#4)] that articulates the public value and contributions of RCACs in an incident response. Unfortunately, the proposed amendments to the RSC section of the Unified Plan [Annex B, Appendix VIII] diminish the RCAC’s principal mechanism for delivering that public value by reducing frequent communication directly with the Unified Command and reducing access to incident response objectives and resources as under the current RSC process. These possibly conflicting roles of the RCACs are particularly worrisome as this could lead the Unified Command to conclusions of their own interpretation of which section of the Unified Plan and/or Subarea Plan to work with in regards to the RCAC’s participation.

If removal of conflicts within the plan is desired with the adoption of these revisions, additional cascading changes may be required. Amendments will likely be necessary to subordinate Subarea plans that further describe the roles of the RCACs. Our comments on the impacts of the proposed revisions take their described roles for the RCAC and other parties appearing in the new RSC section of the Unified Plan at face value. The early 2013 appearance of these changes in the subordinate Southeast Alaska Subarea Plan in advance of their consideration for adoption in the Unified Plan appears to validate these concerns regarding cascading changes to other plans and other sections for alignment.

Because of its broad span of memberships and nearly 25 years of experience, the PWSRCAC’s expertise, local knowledge and understanding of citizen concerns adds

¹ A local government that is eligible to participate as a Local On Scene Coordinator (LOSC) and chooses to participate as a LOSC would receive an IAP.

unique capabilities, public trust, and credibility to the Unified Command and Incident Management Team through our current incorporation into the RSC process. PWSRCAC's membership includes representatives from city and borough governments in the Exxon Valdez oil spill region, as well as from the Alaska State Chamber of Commerce, Alaska Native corporations, the commercial fishing industry, tourism, and the environmental community. During spills that would affect Prince William Sound and the Gulf of Alaska, the PWSRCAC would provide important analyses, as well as input and advice to the Unified Command, by providing highly-trained, experienced individuals to participate in the RSC that would bring to bear the experience of representatives and stakeholders from across the 1989 oil spill region.

The PWSRCAC has an obligation to represent all of its members, including Tribal members. We are particularly concerned that one of the stated intents for the proposed change is to update and address the federal consultation obligation with Federally Recognized Tribes in a real and meaningful way here in Alaska. However, stakeholder engagement is not the same as Tribal consultation, and the effect of the draft actually *diminishes* Tribal status and access to Unified Command and information instead of improving it.

The Oil Pollution Act of 1990 (OPA 90) authorized the establishment of two Regional Citizens' Advisory Councils (RCACs) in Alaska. The statute directs federal agencies to consult with these councils before taking any action with respect to permits, site-specific regulations, and other matters which affect or may affect the vicinity of the facilities covered by the RCAC's advisory purview. We believe this statutory provision was intended to provide the RCACs the *assurance* of participating in oil spill planning and response activities. The PWSRCAC cannot accomplish its mission fully as envisioned under OPA 90 without active participation in planning and response in its statutorily-mandated *advisory role*. During an incident, the PWSRCAC can actually improve communication efficiencies. The PWSRCAC would keep all its stakeholders informed, reducing the total number of stakeholders that the Unified Command and the Liaison Officer would have to independently inform. Elimination of the RSC and subsequent access to the IAP and information from the JIC would greatly hinder, and potentially prevent, the PWSRCAC from carrying out its duties as envisioned under OPA 90.

For over a decade ADEC has used the RSC process, and through that process, ADEC has been an exemplary role model, nationally and internationally, on how to successfully manage incidents on behalf of the State's and public's interests. The IAP, provided during past events, epitomizes the State's commitment and the public's high value placed on transparent communication with potentially impacted communities. ADEC has set a positive precedent where this information has been made available. PWSRCAC supports continuation of this practice that has proven effective and strongly recommends that it not be abandoned. Any change to diminish access to information would be a major step backwards in protecting the public's interests.

Allowing communities and stakeholders access to accurate information and the ability to participate in the RSC has enabled stakeholders to become part of the solution, rather than being excluded. Although such participation by the public adds some additional effort/work on the part of state, federal government and industry officials, it is far superior and unquestionably preferable to having a repeat of the public consternation with spill management in 1989. Any rewrite to this section should aim to go forward and improve on the current RSC process.

In summary, the PWSRCAC has the following concerns with the proposed draft:

- The segregation of local governments and Tribes from all other stakeholders would reduce communication and collaboration between those groups. Two separate stakeholder groups would create confusion, uncertainty, and unnecessary complexity during future incidents and be counterproductive.
- Access to the Unified Command would be effectively reduced for local governments, Tribes, and stakeholder groups.
- Groups such as PWSRCAC, which includes local governments, Tribes, and other types of non-governmental stakeholders, transcend municipal and tribal boundaries. The separation into two groups would create artificial boundaries and barriers to effective communications. Certain groups would likely be conflicted regarding the mechanism to use for stakeholder access.
- The AS Group would be “informed” by the Liaison Officer with no corresponding defined opportunity to provide input or feedback directly to individual members of the Unified Command. This eliminates the opportunity for members of the proposed AS Group, such as the PWSRCAC, from providing expertise on incident priorities, objectives and input on other technical or scientific matters directly to those making the decisions.
- Access to data, such as the IAP, for stakeholders, local, and tribal governments is reduced and/or eliminated.
- There is no basis under the Alaska Incident Management System (AIMS) for forming separate TLG or AS Groups.
- The proposed changes would create a significant administrative burden to government, industry, and the public, as it will trigger a series of amendments to other documents that rely on the Unified Plan or are tiered from it, including amendments to nine Subarea Plans in Alaska, the AIMS Guide, and all industry oil spill contingency plans in Alaska that currently use RSC language.

The PWSRCAC supports stakeholder involvement during oil spills as outlined in the current Unified and Subarea Plans and is committed to the success of the stakeholder involvement process. Over the years, the Council has worked cooperatively with ADEC, the U.S. Coast Guard, industry, and others to apply and refine the RSC approach during drills, exercises and actual incidents. In furtherance of that objective, PWSRCAC recently initiated a series of workshops aimed at informing local and Tribal governments and stakeholder groups about the ICS process and their established roles and constructive participation in spill incident management under the Alaska Incident Management System (AIMS) Guide and the RSC.

Thank you, in advance, for your favorable consideration of these recommendations that the proposed amendment be withdrawn and, in the alternative, that the ARRT engage with the PWSRCAC and other stakeholders to genuinely improve and strengthen the current RSC process.

The Board of Directors and staff of the Prince William Sound Regional Citizens' Advisory Council are available to meet with you and any other appropriate official(s) to discuss this

matter further prior to the next ARRT meeting. Please confirm an opportunity, convenient to you, when such a meeting may be scheduled.

Sincerely,



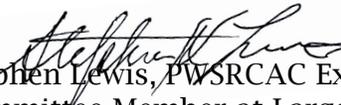
Mark A. Swanson
Executive Director



Thane Miller, Vice President of
PWSRCAC and Executive Committee
Member, Representative from the Prince
William Sound Aquaculture Corporation



Jim Herbert, Treasurer of PWSRCAC and
Executive Committee Member,
Representative from the City of Seward



Stephen Lewis, PWSRCAC Executive
Committee Member-at-Large,
Representative from the City of Seldovia

ALVIN R. BURCH
Al Burch, PWSRCAC Representative
from the Kodiak Island Borough



Cathy Hart, PWSRCAC Representative
from the Alaska Wilderness Recreation
& Tourism Association



Walter Parker, PWSRCAC Representative
from the Oil Spill Region Environmental
Coalition



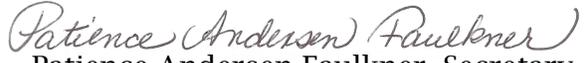
Andrea Korbe, PWSRCAC Representative
from the City of Whittier



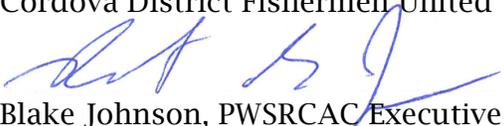
Jane Eisemann, PWSRCAC
Representative from the City of Kodiak



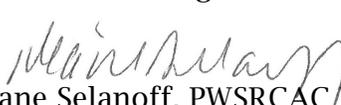
Amanda Bauer, President of PWSRCAC
and Executive Committee Member,
Representative from the City of Valdez



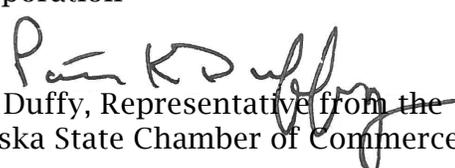
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Blake Johnson, PWSRCAC Executive
Committee Member-at-Large,
Representative from the Kenai
Peninsula Borough



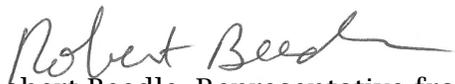
Diane Selanoff, PWSRCAC Executive
Committee Member-at-Large,
Representative from Port Graham
Corporation



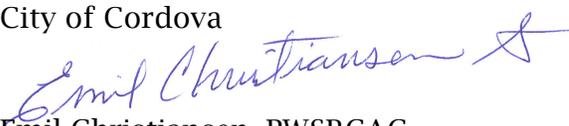
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Alaska State Chamber of Commerce



Dorothy Moore, Representative from the
City of Valdez



Robert Beedle, Representative from the
City of Cordova



Emil Christiansen, PWSRCAC
Representative from the Kodiak Village
Mayors Association

Cc: ARRT Co-Chairs and Member Agencies

Proposed Changes to the Regional Stakeholder Committee in Alaska's Unified Plan

ADEC's Proposed Draft Issued for Public Comment - March 25, 2016

Current Unified Plan (Regional Stakeholder Committee Member)	Proposed Revision Tribal and Local Government (TLG) Group		Proposed Revision Affected Stakeholder (AS) Group	
Current Role	Revised Role	Improved?	Revised Role	Improved?
Access to information on all elements of the spill response effort.	Access to information would be primarily limited to information that the Responsible Party Liaison Officer deems to have a direct impact on the community (e.g., geographic response strategies, potential places of refuge, commercial fisheries or subsistence harvest.)	No	Access to information would be limited to information that the Responsible Party Liaison Officer deems to have a direct impact on the affected public (e.g., commercial or sport fisheries closures, subsistence harvest restrictions, general response operations, public health advisories, maritime safety zones, airspace restrictions)	No
Provide direct advice to Unified Command to provide recommendations, concerns and comments on incident priorities and objectives or to relate local knowledge, expertise or other critical information to protect public interests.	No guaranteed opportunity to provide direct advice to Unified Command. All communication would be routed to Unified Command through the Responsible Party Liaison Officer, and there may be no opportunity to have direct access to the Unified Command.	No	No guaranteed opportunity to provide direct advice to Unified Command. All communication would be routed to Unified Command through the Responsible Party Liaison Officer, and there may be no opportunity to have direct access to the Unified Command.	No
Routine access to Incident Action Plan on the same day as it is developed and revised.	The Responsible Party Liaison Officer would determine when it is appropriate to distribute the Incident Action Plan to the Tribal and Local Government Group and would only provide the sections it deems suitable for public review.	No	No access to Incident Action Plan at all.	No
Provide recommendations on the Incident Action Plan.	Only portions of the Incident Action Plan that the Unified Command has determined are pertinent would be provided for the Tribal and Local Government Group review.	No	No opportunity to provide recommendations on Incident Action Plan because it would not be provided.	No