PRINCE WILLIAM SOUND RCAC REGIONAL CITIZENS' ADVISORY COUNCIL

www.pwsrcac.org

Citizens promoting the environmentally safe operation of the Alyeska terminal and associated tankers.

Members:

Alaska State Chamber of Commerce
Chugach Alaska Corporation
City of Cordova
City of Homer
City of Kodiak
City of Seldovia
City of Seward
City of Valdez
City of Whittier
Community of Chenega
Community of Tatitlek
Cordova District Fishermen United
Kenai Peninsula Borough
Kodiak Island Borough
Kodiak Village Mayors Association
Oil Spill Region Environmental Coalition
Port Graham Corporation
Prince William Sound Aquaculture Corporation

Anchorage
2525 Gambell St., Ste. 305
Anchorage, AK 99503
O: (907) 277-7222
(800) 478-7221

Valdez
P.O. Box 3089
130 S. Meals, Ste 202
Valdez, AK 99686
O: (907) 834-5000
(877) 478-7221

November 19, 2025

Commander, Coast Guard Arctic District (dpi)
PO Box 25517
Juneau AK 99802
Attn: LT Case Kuikhoven

Dear Sir:

Please find enclosed the Prince William Sound Regional Citizens' Advisory Council's application for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

In accordance with procedures developed during the 2014 comprehensive recertification, this application is based on a questionnaire developed by the U.S. Coast Guard for the recertification process. The current package includes the following:

- Completed questionnaire using the form provided by U.S. Coast Guard
- Annual report of the Prince William Sound Regional Citizens' Advisory Council
- Draft news release on the availability of our application for review and comment
- Additional materials: the Council's budget and five-year Long-Range Plan; most recent financial audit; and funding contract and most recent contract addendum with Alyeska Pipeline Service Co.

As discussed previously with the U.S. Coast Guard, we have again attempted to make this application both smaller and easier to review, such as referring the reviewer to our annual report where it covers additional information. If you need anything further, please contact Brooke Taylor in our Anchorage office or me in our Valdez office.

Sincerely,

Donna Schantz
Executive Director

cc: Andres Morales, Alyeska Pipeline Service Co.
PWSRCAC Board of Directors

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Prince William Sound
Regional Citizens' Advisory Council

2025 Recertification Evaluation
OPA 90, Section 5002 (d)

1. Membership. The advisory group should be broadly representative of the interests of the communities in the geographical area.

a. Membership policies, including the selection and appointment process for the advisory group, and any of its Committees, to ensure full public participation.

Membership in the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC or the Council) is governed by its bylaws. Member organizations are communities affected by the Exxon Valdez oil spill and interest groups with a stake in the region. Member organizations appoint individuals to represent them on the PWSRCAC Board of Directors and serve at the pleasure of the organization.

The bylaws require each representative to be a resident of the State of Alaska. Directors serve staggered two-year terms. There is no limit to how many terms a Director may serve. When a Director's term expires, the member organization submits in writing the name of the person it wishes to be seated as its representative on the Board. Directors are formally seated by a vote of the Board of Directors at their annual meeting in May. When a Director leaves in mid-term, the member organization may appoint a replacement to fill the unexpired term, subject to formal seating by the Board of Directors.

The following organizations hold ex officio seats as non-voting members of the Board of Directors:

- Alaska Department of Environmental Conservation (ADEC)
- Alaska Department of Fish and Game, Habitat Division (ADFG)
- Alaska Department of Natural Resources (ADNR)
- Bureau of Land Management (BLM)
- National Oceanic and Atmospheric Administration (NOAA)
- Oil Spill Recovery Institute (OSRI)
- U.S. Coast Guard, Marine Safety Unit Valdez (USCG)
- U.S. Department of the Interior (DOI)
- U.S. Division of Homeland Security & Emergency Management, Alaska Department of Military and Veterans Affairs
- U.S. Environmental Protection Agency (EPA)
- U.S. Forest Service (USFS)

PWSRCAC's work is assisted by five volunteer technical committees which operate with financial and staff support from PWSRCAC. Membership on these advisory

committees is open to any member of the public, including PWSRCAC Board members, subject to appointment by the PWSRCAC Board.

The committees are:

- Oil Spill Prevention and Response Committee (OSPR)
- Scientific Advisory Committee (SAC)
- Terminal Operations and Environmental Monitoring Committee (TOEM)
- Port Operations and Vessel Traffic Systems Committee (POVTS)
- Information and Education Committee (IEC)

Members of the PWSRCAC Board and committees are listed in the PWSRCAC annual report ("Prince William Sound Regional Citizens' Advisory Council 2024-2025 Year in Review," pages 21-23) enclosed with this application.

PWSRCAC works to ensure that representative communities and interest groups are well informed of our work. Following impacts from the COVID-19 pandemic, during the period of 2023-2025, PWSRCAC worked to improve our virtual and community outreach presentations, public receptions, youth education, workshops, and meetings in the Exxon Valdez oil spill region (see pages 18-20 of the annual report).

b. Opportunities provided for interested groups to participate. Membership should represent but not be limited to:

(i) Local commercial fishing industry organizations whose members depend on the fisheries resource of the waters in the vicinity of the terminal facilities;
X Yes __ No Describe: Cordova District Fishermen United

(ii) Aquaculture associations in the vicinity of the terminal facilities;
X Yes __ No Describe: Prince William Sound Aquaculture Corporation

(iii) Alaska Native Corporations and other Alaska Native organizations whose members reside in the vicinity of the terminal facilities;
X Yes __ No Describe: Chugach Alaska Corporation; Chenega Corporation and Chenega IRA Council; Tatitlek Corporation and Tatitlek IRA Council; Port Graham Corporation; and six villages on Kodiak Island that are represented by the Kodiak Village Mayors Association.

(iv) Environmental organizations whose members reside in or use the vicinity of the terminal facilities;
X Yes __ No Describe: The Oil Spill Region Environmental Coalition, consisting of the following members: The Alaska Center; Alaska Marine Conservation Council; Cook Inletkeeper; Copper River Watershed Project; Eyak Preservation Council; Kachemak Bay Conservation Society; and Kodiak Audubon Society.

(v) Recreational organizations whose members reside in or use the vicinity of the terminal facilities;
X Yes __ No Describe: The Oil Spill Region Recreational Coalition, consisting of the following members: the Prince William Sound Stewardship Foundation; Valdez Adventure Alliance; and Friends of Kachemak Bay State Park.

(vi) The Alaska State Chamber of Commerce or other organization, representing the locally based tourist industry;
X Yes __ No Describe: Alaska State Chamber of Commerce

(vii) Other.
X Yes __ No Describe: Kenai Peninsula Borough; Kodiak Island Borough; cities of Cordova, Valdez, Whittier, Seward, Homer, Seldovia, and Kodiak.

c. The extent to which meetings are publicized in the media and are accessible to members of the general public. Describe:

PWSRCAC Board meetings are open to the public and include an agenda item for public comment. Board meetings are publicized via news releases, advertisements, community calendar postings in newspapers within the Exxon Valdez oil spill region, emails to various lists maintained by PWSRCAC, social media, email distributions to partners and other stakeholders, and by the posting of agendas and supporting materials to our website, www.pwsrcac.org. Meetings of PWSRCAC technical committees are also open to the public. They are publicized by email and by the posting of agendas and supporting materials to committee websites maintained by PWSRCAC. Prior to the start of the pandemic, our Board and committee meetings always included a call-in option for those not able to participate in person; since 2020, we have implemented Zoom videoconferencing and teleconferencing for all public meetings.

2. Establishing communications with industry and government. The Coast Guard will consider the means by, and the extent to which, the advisory group maintains open communications with industry and government interests (oil terminal, oil tanker, and state and federal government representatives). In assessing the group's ability to communicate with these interests, the Coast Guard's review will include but not be limited to the following:

a. A determination as to whether the group works with industry and government to establish and employ communications protocols for reviewing policies, projects, and release of information relating to the operation and maintenance of the oil terminal facilities and crude oil tankers which affect or may affect the environment in the vicinity of their respective terminals.
X Yes __ No Describe:

We strive for maximum interaction and cooperation with the industry companies and the regulatory agencies involved with marine transportation of Alaska North Slope crude oil. This open communication is in keeping with our mandate under the Oil Pollution Act of 1990 (OPA 90) to reduce complacency by promoting partnerships in the common effort to minimize the risk of crude oil spills, improve the capability for responding to spills, and minimize the environmental impacts of routine operations. We participate with industry and regulators in numerous work groups and task forces, encourage industry and government representatives to attend and

participate in our Board and committee meetings, and routinely solicit their comments and input.

As noted, PWSRCAC's Board provides ex officio seats for various government agencies, including the USCG, EPA, ADEC, BLM, NOAA, and others. PWSRCAC also communicates with government agencies through several formal and semi-formal meetings. Many state and local government staff, as well as Prince William Sound (PWS) Shippers, Southwest Alaska Pilots Association, and Alyeska Pipeline Service Company (Alyeska) employees attend PWSRCAC's triannual Board meetings. Staff from the USCG, BLM, ADEC, NOAA, PWS Shippers, as well as Alyeska, regularly attend meetings of PWSRCAC's technical committees to discuss terminal and tanker related policies, projects, and operational and maintenance information. PWSRCAC staff strives to attend stakeholder breakfasts hosted by USCG Marine Safety Unit (MSU) Valdez, where representatives from both state and federal agencies, as well as industry representatives including Alyeska, are in attendance.

Staff host monthly communication meetings with ADEC and continue to meet monthly with Alyeska's Ship Escort Response Vessel System (SERVS) personnel to discuss operations, contingency planning issues, and projects of mutual interest.

Managers of PWSRCAC and Alyeska meet monthly to discuss issues of mutual interest, and the staff interact regularly. Working with the designated Alyeska liaison, PWSRCAC requests, receives, and discusses Valdez Marine Terminal (VMT) operations and maintenance information. Through this line of communication with Alyeska, PWSRCAC remains appraised of both routine and emergent operational and maintenance issues, as well as terminal project related information.

PWSRCAC staff interact regularly with officials of the shipping companies operating oil tankers out of Valdez, and executives of these companies visit PWSRCAC's Valdez and Anchorage offices on an informal basis. Also, shipper executives regularly accept invitations to address PWSRCAC at Board meetings. Since 2021, PWSRCAC staff continue to meet monthly with Marathon Petroleum Company to discuss issues of mutual interest and concern. Alaska Tanker Company, Hilcorp, and Repsol have also partnered with the Council on public receptions in connection with several of our Board meetings.

PWSRCAC continues to attend and participate in quarterly VMT Coordination Workgroup meetings with invitees including BLM, EPA, ADEC, USCG, Alyeska, and SERVS. The purpose of this workgroup is to provide an open forum for communication on contingency planning. The goal is to achieve a continuous improvement process to maximize contingency plan effectiveness for the VMT.

PWSRCAC sponsors and participates in many industry and/or government-sponsored group events, as described elsewhere in this application. These groups include:

- Alaska Forum on the Environment's Oil Spill Sessions Planning Committee, including EPA, DOI, USFWS, and ADEC
- PWS Natural History Symposium, including Prince William Sound Stewardship Foundation, U.S. Forest Service, Alaska State Parks, and Alaska Native organizations
- Alaska Regional Response Team (ARRT) and related working groups, an advisory board to the Alaska Federal On-Scene Coordinators led by the USCG, ADEC, and EPA
- Arctic and Western Alaska Area Committee, including administration, exercise and training, and geographic response strategies (GRS) subcommittees; members include USCG, ADEC, EPA, NOAA, Bureau of Safety and Environmental Enforcement (BSEE), ADFG, DOI, and Cook Inlet Regional Citizens Advisory Council (CIRCAC)
- PWS Area Committee, including the administration subcommittee. Members include USCG, ADEC, ADFG, and OSRI
- OSRI Scientific-Technical Committee
- Pacific States/British Columbia Oil Spill Task Force, including ADEC, USCG, NOAA, CIRCAC, and many other state, provincial, U.S. federal, Canadian federal, Native and First Nation tribal governments, industry, and NGOs
- Valdez Marine Safety Committee, facilitated by SERVS and consisting of personnel from ADEC, Alyeska, USCG, Edison Chouest, City of Valdez, and additional stakeholders
- Vessels of Opportunity (VOO) Industry/Stakeholder Workgroup: current Alaska-specific members include Alyeska/SERVS, CIRCAC, Alaska Chadux Network, Cook Inlet Spill Prevention and Response, Inc., and Southeast Alaska Petroleum Response Organization
- Interagency Coordinating Committee on Oil Pollution Research, including USCG, EPA, NOAA, BOEM, BSEE, USFWS, USGS, DOE, and PHMSA

These frequent, multi-level contacts between PWSRCAC, industry, and regulators ensure each organization is made aware of the other's work and perspectives on a variety of issues. We fully expect these meaningful collaborations to continue given the value provided to all parties.

PWSRCAC employs contractors in Juneau, Alaska, and Washington, D.C., to monitor legislative and administrative developments at the state and federal levels in areas of Council concern. These contractors advise PWSRCAC on how to engage in the legislative process, and occasionally will provide oral or written testimony on behalf of the Council.

In conjunction with our state legislative monitors, PWSRCAC has continued to support the creation of an Alaska invasive species council to manage invasive species across agencies and jurisdictional boundaries; to maintain adequate funding for the state's oil spill prevention program and its ability to respond to major oil spills; and address concerns about contamination from perfluoroalkyl and

polyfluoroalkyl substances (PFAS) in fire-fighting foam stored at the terminal. In addition to this, Council staff worked closely with Alaska State Senator Forrest Dunbar's office to develop language and provide invited testimony for Alaska State Senate Joint Resolution 12 (SJR 12), which advocated for NOAA to provide timely repairs to their weather buoys in Alaska. SJR 12 was passed by both chambers of the Alaska State Legislature in Spring 2025. At the federal level, the Council has worked with the Alaska Congressional Delegation to support the Government Accountability Office review of the Joint Pipeline Office's regulatory oversight of the Trans Alaska Pipeline System (TAPS), including the VMT. Other work with the Delegation has included efforts for a permanent regulatory or legislative remedy to the potential application of USCG vessel inspection regulations to the Alyeska/SERVS contracted fleet of vessels, referred to as VOO, that form the backbone of a response to an oil spill in our region, and support for NOAA's National Data Buoy Center to receive additional funding for timely repairs to key weather buoys used by the Coast Guard to make critical navigation safety decisions for outbound laden oil tankers in Prince William Sound.

Informing and advising both the Alaska State Legislature and the Alaska Congressional Delegation has become more urgent in recent years, particularly regarding potential impacts of continued regulation reductions and agency budget cuts to oil spill prevention and response. PWSRCAC recognizes the importance of strong regulations and sufficient government funding and oversight to prevent spills and ensure there is an adequate response system in place should prevention measures fail. This need for robust prevention and response measures is especially true at a time when oil production is expanding in Alaska. The Council wants to ensure that regulators and industry avoid the complacency that Congress determined was a major contributing factor in the 1989 Exxon Valdez oil spill.

In summary, PWSRCAC continues to pursue and maintain the type of collaborative relationship with industry and government envisioned in OPA 90.

b. A determination as to whether the group participates in discussions with industry and government, concerning permits, plans, and site-specific regulations governing the activities and actions of the terminal facilities which affect or may affect the environment in the vicinity of the terminal facilities and of crude oil tankers calling at those facilities.
X Yes __ No Describe:

PWSRCAC tracks and reviews state and federal site-specific regulations. This tracking is done by monitoring updates that are proposed, under review, or finalized in the Federal Register, State of Alaska Listserv, and public notices. As a part of this process, PWSRCAC periodically discusses the applicability, interpretation, and enforcement of these regulations with industry and regulatory agencies through individual and committee meetings, and through regulatory processes such as informal reviews.

PWSRCAC has routinely provided public outreach in Exxon Valdez oil spill region communities on several issues, such as public engagement on ADEC proposed regulation changes; future research needs on the impact of oil spills; the use of chemical dispersants; sharing resources related to the Regional Stakeholder Committee; and the SERVS program.

In 2019, the Council recommended ADEC to take steps to ensure the secondary containment liners around the 14 crude oil storage tanks at the VMT would prevent spilled oil from reaching groundwater, which would also likely impact Port Valdez. This recommendation came after investigations conducted between 2014 and 2017 showed that there were cracks and holes in the liners indicating they may not function as intended if a spill occurred from one or more of the tanks. While ADEC has been the lead regulatory agency with regard to verifying the integrity of the secondary containment liners, there are both state and federal regulations (from BLM and EPA) governing liner requirements at the VMT. From 2019 through the present, the Council has raised issues, provided comments, and held discussions with ADEC and Alyeska related to the integrity of the liners. The Council has conducted and sponsored research to support ADEC and Alyeska's efforts to ensure liner integrity, including suggesting liner testing methods, monitoring pilot studies, and analyzing Alyeska's proposed methods to evaluate liner integrity.

To help identify solutions, the Council commissioned research on non-destructive methods to evaluate the integrity of the liners. In January 2023, the Council released a report demonstrating how electrical leak location (ELL) surveys can be used to find potential damage in the liners that are buried under 3-5 feet of gravel and are almost 50 years old. It was also determined that at least 20% of the liners would need to be tested to have confidence that ELL would identify and locate defects in the liners and that they will reliably hold spilled oil as intended.

In 2025, the Council released a report summarizing the findings from a pilot study that Alyeska had conducted in July 2024 to evaluate ELL and electrical resistivity tomography testing methods, and providing recommendations for Alyeska's larger-scale testing plan. In February 2025, ADEC issued an extension for Alyeska to determine the integrity of the liner, requiring inspections to begin no later than July 2026, and to be completed by November 2028. Most recently, in August 2025, Alyeska announced a complete change in evaluation methodology from ELL to a hydraulic (flood) test, and the Council is currently working to provide comments to ADEC on this change (see page 9 of the annual report).

c. A determination regarding the extent to which the advisory group is working to build cooperation rather than confrontation with industry and government by:

(i) Working with industry and government to develop spill prevention and contingency plans;
X Yes __ No Describe:

PWSRCAC has continued its longstanding participation in the development and improvement of both the terminal and tanker contingency plans. This work is performed with regulatory and industry stakeholders through regular meetings of the VMT Coordination Workgroup, and internally through PWSRCAC's Contingency Plan Project Team. Since 2023, PWSRCAC has provided extensive comments on the Oil Discharge Prevention and Contingency Plan for the Prince William Sound shippers, which had a major amendment approved in June 2024 to address regulatory changes made in 2023, and the five-year renewal of the oil spill contingency plan for the terminal, which was approved in November 2024. In 2025, the Council reviewed new contingency plan applications for four additional TAPS shippers in PWS.

There has been an ongoing annual shortfall in the State of Alaska's funding mechanism to ensure adequate funds to support the prevention of, and be prepared to respond to, catastrophic spills of oil and hazardous substances through ADEC's Division of Spill Prevention and Response (SPAR). The reduced SPAR funding now requires an annual infusion of unpredictable General Fund dollars and a drawdown from the limited SPAR fund balance. The Council continues to advocate for and support state legislation that would provide sustainable funding for ADEC's SPAR Division.

In 2023, the U.S. Coast Guard issued a Work Instruction requiring Certificates of Inspection (COI) for vessels that tow boom and other response equipment during oil spill drills and actual incidents. This Work Instruction was implemented in response to a provision in the 2023 National Defense Authorization Act. Unfortunately, affected vessels included the fleet of 350+ uninspected vessels contracted by Alyeska/SERVS to support an oil spill response. Most of these vessels were built for purposes other than oil spill response, such as commercial fishing. If implemented, these inspections would pose significant challenges to response readiness in the Exxon Valdez oil spill region. Many of the vessels have not been subject to this type of inspection before and the modifications needed to be issued a COI would likely exclude many from participating in the SERVS program altogether. The Council has been engaging in an industry/stakeholder workgroup to help develop a legislative solution or exemption that would allow the current fleet to remain in operation.

PWSRCAC continues to partner with Alyeska/SERVS staff to share the fishing vessel program's annual oil spill training with local citizens, a program that started in 2016. PWSRCAC chartered a passenger vessel in Valdez in 2023, and in Whittier in 2024, to take local community members to observe and learn about SERVS' oil spill training for local fishermen and mariners. Our next event is being planned for Kodiak in spring of 2026.

In 2024, the Council organized a meeting with the Alyeska/SERVS contracted vessel representatives to discuss the status and overall health of the program, the hands-on training, and any port-specific issues. At least one representative from each of the six ports where vessels are on contract attended this virtual meeting. There was consensus among fleet representatives that the program is currently stable and healthy.

PWSRCAC staff also participate in the Arctic and Western Alaska Area Committee, PWS Area Committee, and Inland Area Committee to establish stronger outreach and community engagement plans.

The Council also regularly invites industry representatives to provide information and updates at Board and committee meetings. For example, at the Board's most recent meeting (September 2025), representatives from Alaska Tanker Company and Teekay Tankers provided presentations on their companies' vessel operations and training programs for mariners working on their tankers, respectively.

(ii) Coordinating study projects, policies and legislative or regulatory recommendations; and
X Yes __ No Describe:

PWSRCAC's practices with respect to scientific study projects are discussed in detail in "3. Scientific work." More generally, PWSRCAC fosters coordination and awareness of our projects, policies, and legislative or policy recommendations through our public Board and committee meetings; numerous workgroups and panels in which we participate; publication of our annual report and Observer newsletter; the vast material available on our website; production of news releases and op-ed articles; and public availability of our formal comments and advice on legislative and regulatory issues.

PWSRCAC continues to attend the ARRT biannual meetings. For the Arctic and Western Alaska Area Committee, PWSRCAC participates in the Area Committee, Administration Subcommittee, Exercise and Training Subcommittee, and Geographic Response Strategy (GRS) Subcommittee, regularly attending and providing feedback at meetings. PWSRCAC has provided both formal and informal comments on updates to the area contingency plan covering Arctic and Western Alaska. The Council's participation in the PWS Area Committee includes formal and informal comments on the PWS Area Contingency Plan and attendance at Administration Subcommittee and Area Committee meetings. PWSRCAC has also participated in a collaborative process between state and federal agencies, industry, Alaska Native groups, and citizens councils on developing guidelines for a Regional Stakeholder Committee process during an event.

In 2025, ADEC began conducting requests for informal comments on several State of Alaska regulations. PWSRCAC has provided public testimony and submitted written comments for several of these requests pertaining to oil and hazardous substance pollution prevention, as well as air and water quality.

PWSRCAC has been maintaining two weather buoys in Port Valdez, deployed in 2019. One weather buoy is near the Alyeska VMT, and the other was formerly near the Valdez Duck Flats. The Valdez Duck Flats weather buoy was pushed off station by ice in February 2025, and discussions are underway to potentially relocate it. The weather buoy located adjacent to the VMT remains on station and operational. This weather monitoring effort is made possible by partnerships with Alyeska, the Prince William Sound Science Center (PWSSC), and the City of Valdez. These buoys measure ocean currents, wind, and waves, and standard meteorological measurements. The Council works with the Alaska Ocean Observing System (AOOS) and the National Oceanic and Atmospheric Administration's PORTS® (Physical Oceanographic Real Time System) to publicly share the data. While it is too soon to confirm long-term weather patterns, there is enough data available to begin analyzing recent trends (more information on page 6 of the annual report).

The Council maintains a CTD (conductivity, temperature, and depth) sensor at the Kelsey Dock in Valdez. The Council works with the AOOS and the NOAA PORTS® to share the data.

The Council supports two weather stations in the greater Prince William Sound region and the Gulf of Alaska. Information is collected via the Prince William Sound Weather Station Network, developed and maintained by the PWSSC, and co-funded by the Council. Data is available through the PWSRCAC, PWSSC, and AOOS websites (see pages 6-7 of the annual report).

From October 2024 through March 2025, Council staff engaged in a three-part workshop series hosted by the National Academies of Science, Engineering and Medicine Gulf Research Program that brought together individuals from Alaska and the Gulf Coast. The workshop aimed to engage these two regions, having experienced the Exxon Valdez and BP Deepwater Horizon oil spills, to share experiences, knowledge, strategies, and best practices related to oil spill preparedness and prevention.

In March 2025, the Council was honored to co-organize and co-facilitate a workshop at the annual Subsistence Memorial Gathering in collaboration with the Chugach Regional Resources Commission and Alaska Sea Grant. The event honored the resilience and traditions of the Chugach region and its people in the wake of the tragic Exxon Valdez oil spill, which profoundly impacted communities and ecosystems. Over 100 people participated in a workshop helping to shape future research and community engagement.

(iii) Keeping industry and government interests informed of its plans, findings, and recommendations.
X Yes __ No Describe:

The processes described in Section 2.c.(ii) above also serve the purpose of keeping industry and government interests informed of our plans, findings, and recommendations. We regard the workgroups in which we participate and the meetings of our technical advisory committees as particularly effective tools for this purpose.

One specific example of coordination with industry and government that was previously referenced is the efforts to address the USCG Work Instruction requiring Certificates of Inspection for VOO that tow boom and other response equipment during oil spill drills and actual incidents. As noted earlier in the application, the Council has been engaging in a workgroup to help develop a legislative solution or exemption that would allow the current SERVS uninspected response vessel fleet to remain in operation. Workgroup members include the Council, Alyeska/SERVS, CIRCAC, Alaska Chadux Network, Cook Inlet Spill Prevention and Response, Inc., and Southeast Alaska Petroleum Response Organization.

We also regularly distribute our reports and findings to industry and regulatory groups. For example, our most recent reports on oil spill drill monitoring and properties of Alaska North Slope crude oil were transmitted to Alyeska/SERVS, ADEC, BLM, and USCG.

3. Scientific work. The Coast Guard will review the extent to which the advisory group coordinates its independent scientific work with the scientific work performed by or on behalf of the terminal operators and operators of the crude oil tankers in an effort to avoid unnecessary duplication, and to ensure that research and studies are relevant to issues that impact the environment in the vicinity of the terminal facilities and of crude oil tankers calling at those facilities. Describe/Examples:

PWSRCAC has established policies and practices to ensure its independent scientific work addresses environmental issues related to the VMT and associated tankers. Further, the Council's work is coordinated with scientific work done by others for terminal and tanker operators in order to avoid unnecessary duplication.

To coordinate its independent science and ensure the work remains relevant to the operation of the terminal and tankers, the Council's committees follow a documented, well-developed process to plan and execute scientific projects. The planning process entails annual evaluation of the merits and relevancy of both ongoing and new projects. The Council also annually solicits project proposals related to relevant science within our region from partner organizations, regulatory agencies, industry, and the public. Recent projects have included continuation of

long-term hydrocarbon monitoring in mussels, water, and sediments near the VMT; assessing health and recovery of wildlife injured during the Exxon Valdez oil spill such as forage fish and marine birds; tracking and making publicly available weather conditions which affect tanker operations and can be used to make informed decisions during an oil spill; monitoring for marine invasive species that may be introduced by tankers; and maintaining a comprehensive database of peer-reviewed literature on chemical dispersants.

PWSRCAC routinely distributes copies of Board and committee agendas and background packets to Alyeska, regulators, and oil shippers to keep them informed of proposed and ongoing scientific work, including status updates and draft reports for review and comment. PWSRCAC Board and committee meetings are open to the public, providing regular opportunities for any interested parties to monitor and comment on research projects. PWSRCAC staff, committee, and Board members regularly attend major conferences to maintain contact with experts in environmental science and oil spill prevention and response, and to keep informed about current research.

An outstanding example of ongoing scientific work conducted by the Council and coordinated with industry and regulatory stakeholders is the Long-Term Environmental Monitoring Program (LTEMP). The program has been occurring since 1993 through present day – over 30 years. The goal of LTEMP is to monitor for oil pollution associated with the operation of the VMT and associated tankers. LTEMP includes the collection and analysis of environmental samples from blue mussels, marine sediments, and passive sampling devices in the water. Collecting these samples would not be possible without coordination with and cooperation from Alyeska as well as state and federal regulators, such as USCG and ADFG.

The Council has conducted extensive monitoring for marine invasive species for decades. Species such as the European green crab can potentially be introduced through tanker operations. Annually, the Council works with Alyeska, ADFG, local harbormasters, and community partners to deploy Fukui traps and settlement panels to monitor for the presence of European green crab, tunicates, and other invasive species. In 2023, a broad-scale survey for invasive species was carried out at 11 remote sites throughout Prince William Sound. Settlement panels, small passive samplers that hang in the water from existing structures, were deployed in June and retrieved in September. During this time, organisms settled and grew on the panels. The organisms on the panels were then identified by taxonomists and samples were collected for genetic analysis. A similar survey was conducted in Kachemak Bay in 2025.

In recent years, Council staff and contractors published two peer-reviewed papers in the Proceedings of the 2024 International Oil Spill Conference on long-term environmental monitoring and building collaborative social science to understand the impacts of oil spills, and a peer-reviewed paper in the journal "Environmental

Science: Advances" on the oiled ballast water treatment process at the VMT. The Council's long-term environmental monitoring efforts were presented at the Pacific Northwest Chapter meeting of the Society of Environmental Toxicology & Chemistry, and with a poster at the Alaska Marine Science Symposium. A presentation on invasive species risk from biofouling in our region was shared at the Alaska Invasive Species Partnership Workshop.

Since 2016, more than 25 foreign-flagged vessels have loaded oil at the VMT. In response to the increasing number of foreign crews entering Prince William Sound, the Council has begun to work with Dr. Nicole Ziegler, a linguist at the University of Hawaii, to conduct research on miscommunication in the maritime industry, particularly miscommunication from linguistic, cultural, and social issues. Dr. Ziegler has completed the first two phases of this project. In 2023, Phase 1 consisted of a literature review summarizing current research on the topic. In 2024, Phase 2 focused on an analysis of National Transportation Safety Board investigations of maritime incidents where miscommunication was identified as a leading cause. The Council is currently supporting the third phase of the project, a needs-based analysis where Dr. Ziegler will interview vessel officers, pilots, and able-bodied seamen to gain insight into what they need to advance and support improved communication in their industry. Preliminary results have highlighted the master-pilot exchange and mariners' lack of experience asking questions and bringing up concerns to superiors as areas to focus on.

The Cordova-based OSRI has been an ex officio member of PWSRCAC since 1997. OSRI is associated with the PWSSC, providing another avenue for coordination and expert oversight of PWSRCAC's scientific work. Council staff participate in OSRI's Scientific and Technical Committee.

All these efforts toward inclusion and coordination are reflected in the descriptions of our activities in specific topic areas within our annual report and elsewhere in this application. In addition, we are enclosing, as Attachment 1 to this questionnaire, a list of reports produced by PWSRCAC and its contractors in this recertification period, as well as a list of the scientific and technical experts we have consulted.

4. Monitoring program. The Coast Guard will review the extent to which the advisory group develops and carries out an effective monitoring program, including:

a. Reviewing the operation and maintenance of terminals and tankers;
Describe/Examples:

Through the TOEM Committee, PWSRCAC reviews the operation and maintenance of the VMT in the interest of mitigating its environmental impacts. PWSRCAC monitors a variety of operations-related metrics (e.g., spill reports, water and air quality data) and reviews Alyeska reports (e.g., their annual facility integrity report) concerning terminal maintenance and environmental impacts. Additionally, the

committee monitors and reviews Alyeska projects to maintain, repair, or replace VMT assets and equipment used in prevention or mitigation of the effects of an oil spill. During their public meetings, the TOEM Committee and Alyeska discuss terminal-related operational and maintenance issues. As needed, the TOEM Committee initiates projects with recognized expert contractors to further review and analyze specific terminal operations and maintenance practices.

In 2022, vents on several crude oil storage tanks at the terminal were severely damaged or sheared off due to unmitigated snow load and ice accumulation. In 2025, to address concerns raised by the public, the Council released a study to better understand the volume of emissions that were released. The report describes how the conclusions were developed, which provides perspective on the incident's impacts on air quality for terminal employees and Valdez residents. This was done in the interest of satisfying our mandate to monitor the actual and potential environmental impacts of the operation of the terminal facilities. Alyeska disagrees with the report's findings, but has not yet clarified which aspects they consider inaccurate. The Council remains open to reevaluating the findings of this report should Alyeska provide additional information (see page 9 of the annual report).

In 2023, the Council released a report titled, "Assessment of Risks and Safety Culture at Alyeska's Valdez Marine Terminal," by Billie Garde. This report was initiated in response to safety concerns brought to the Council by current and former Alyeska employees, some of which were related to the 2022 tank vent incident. The study documented unacceptable safety risks at the terminal. Since that time, the Council has been monitoring the actions taken by Alyeska to improve the work culture and more effectively promote an atmosphere of safety.

Alyeska has undertaken substantial work to address the recommendations in the Garde report, such as conducting internal reviews and contracting with a third party to audit various factors affecting safety at the terminal. These efforts identified areas for improvement that Alyeska is working to address, including improved documentation of process safety management, additional training, a review of deferred maintenance, and enhanced evaluation of risks associated with work orders.

Though many of the safety issues have been addressed, the Council is still monitoring recent loss of key staff with extensive institutional knowledge; gaps in regulatory oversight and monitoring that remain unaddressed; and continued reports from employees concerned about safety issues (see page 8 of the annual report).

In 2023, the Council released a study that investigated the terminal's process of removing crude oil residue from unsegregated tanker ballast water, specifically regarding oxygenated hydrocarbons and heavy metals. Oxygenated hydrocarbons are currently not monitored or regulated because they cannot be detected with the

same process as other components of crude oil, such as benzene, toluene, ethylbenzene, and xylenes. For the study, water was sampled at four different points in the ballast water treatment process. Results indicated that one of the steps in the treatment, which uses dissolved air to remove small particles of hydrocarbons from the water, may lead to the formation of oxygenated hydrocarbons that are then released in the effluent to Port Valdez. The report highlights the need for comprehensive monitoring of ballast water treatment processes.

In 2025, the Council issued a report reviewing maintenance practices and provided recommendations for improvements to help minimize the risk of an oil spill from ballast water storage tank number 93 at the VMT. The report noted that, while Alyeska has made some positive improvements to prevent corrosion, some concerns remain with how corrosion rates are monitored and calculated.

b. Monitoring cleanup drills and actual spill cleanups;
Describe/Examples:

PWSRCAC devotes considerable effort to monitoring drills, exercises, and training events, as well as responses to actual incidents. These efforts are described in detail on page 13 of the annual report. Staff often participate as members of drill planning teams along with ADEC, USCG, and industry. Drill monitoring reports are prepared by staff and contractors and submitted to the OSPR Committee for acceptance. An annual drill monitoring report is submitted to the PWSRCAC Board for approval before general release (see Attachment 1, Scientific Work).

In addition, PWSRCAC holds a standing monthly meeting with personnel from Alyeska/SERVS and reviews SERVS operations. This meeting enhances communication and provides a venue to share information, pose questions, and provide or request status reports. Regular topics of discussion include SERVS' operations, maintenance and exercise schedules, and PWSRCAC's schedule of events and meetings. Other agenda topics include ongoing or upcoming PWSRCAC projects involving SERVS' operations.

PWSRCAC also conducts monthly communications meetings with ADEC representatives. Topics of discussion include the review of schedules for projects, meetings, contingency plan deliverables, and events such as drills and exercises. Other agenda topics include discussion of current issues and projects. These meetings have been effective in improving communication between the Council and ADEC.

PWSRCAC staff and volunteers regularly participate in annual drills conducted by the TAPS shipping companies, such as the two recent large-scale exercises by Polar Tankers/ConocoPhillips and Andeavor LLC/Marathon. Council members typically fill evaluator roles during exercises and provide feedback to Alyeska and the TAPS shippers in the form of observations and recommendations to help improve future

exercises and actual oil spill responses. During the Andeavor LLC/Marathon drill, there was much interest in previous Council-sponsored research on Potential Places of Refuge (PPOR) for oil tankers in our region. Council staff traveled to a Marathon drill in Kenai, Alaska, at industry's request, to discuss PPOR further and is currently looking to expand on that work in the coming year. Additionally, PWSRCAC staff participated in training events conducted by Alyeska including, multiple planned VMT tabletop, equipment deployment, and sensitive area protection oil spill exercises; unannounced exercises; and annual training for contracted fishing vessel, oiled wildlife, Shoreline Cleanup Assessment Technique, and more.

During each of these exercises, PWSRCAC personnel worked closely with federal, state, and local agencies, as well as Tribal, industry, and stakeholder representatives to establish relationships to enhance oil spill prevention and response.

On August 30, 2023, a fire occurred near one of the large crude oil storage tanks in the East Tank Farm at the terminal. Alyeska has completed their investigation and the fire appears to have been caused by a malfunction of equipment used to process oily sediment removed from a crude oil storage tank during cleaning. It appears the malfunction allowed oxygen to enter a dryer that contained residual hydrocarbons at a high temperature, which caused the fire. The Council has requested a copy of the investigation report from Alyeska and the State Fire Marshal's office, but to date, have not received it. Alyeska has stated that the findings of the investigation should result in corrective action to make sure the issue does not recur.

In 2025, the Council has been reviewing changes in the products that could be used to disperse spilled oil in our region. These changes stemmed from new regulations put in place by the EPA for testing and listing dispersants. The new requirements are part of the National Contingency Plan Subpart J regulations for products available for use on oil spills. Corexit 9500A, the product stockpiled in Alaska and elsewhere, will no longer be included on the EPA's list of products that meet the new testing protocols after December 12, 2025. A new product, Dasic EcoSafe OSD, is replacing Corexit 9500A in Alaska.

c. Reviewing the results of oil spills in its region;
Describe/Examples:

When a TAPS-related spill occurs, PWSRCAC is active in observing Incident Management Team operations as well as field cleanup activities. The Council also provides input and advice to industry and regulators regarding specific response operations at the VMT. After approximately 1,400 gallons of oil was spilled into Port Valdez from the terminal in April 2020, mussels were compared from three areas: within the spill site, near the Valdez harbor, and a control site. The levels of oil in the mussels were found to have declined by August; however, the mussel genes showed

evidence of lingering effects. The research also expanded the study from 14 genes to over 7,000. In 2023, the Council released a report on how researchers identified how gene expression varied based on different contaminants. The crude oil-contaminated samples were compared to samples from the Valdez harbor, which were contaminated with pollutants such as diesel fuel or vessel exhaust, and the control site. Genes associated with stress and the immune system were among those that varied between the three sites. While these studies will help improve the Council's monitoring program, the researchers noted that the findings could potentially improve monitoring in marine environments around the world.

In addition to the above noted significant spills, the Council also regularly reviews the results of relatively minor oil spills that occur due to the operation and maintenance of the Valdez terminal and tankers. Whenever a spill occurs, Alyeska notifies the Council as well as state and federal regulators. These notifications are saved by the Council, reviewed at the time they are received, and reported on in-depth at least annually during the January PWSRCAC Board of Directors meeting. If a particular spill is significant (e.g., oil impacts the water or a particularly large volume is spilled to land or secondary containment), Council staff work with Alyeska to learn more about the cause of the spill, the response, and what Alyeska is doing to prevent similar incidents in the future. Information about these relatively minor spills is shared with Council management and often during public meetings of the TOEM and OSPR Committees.

d. Reviewing government and company reports;
Describe/Examples:

PWSRCAC routinely reviews and analyzes industry and government reports relevant to operations in PWS, often utilizing the services of contractors with technical expertise in the subjects covered by these reports. In the past three years, PWSRCAC has provided input on informal and formal public reviews of State of Alaska regulatory updates and changes to federal and state area planning. For example, in August 2025, the Governor of Alaska issued two Administrative Orders: No. 360 – Regulatory Reduction and No. 359 – Government Efficiency Review. In accordance with these Administrative Orders, ADEC began conducting requests for informal comments on several State of Alaska regulations. As noted earlier in this application, PWSRCAC has provided public testimony and submitted written comments for several of these requests pertaining to oil and hazardous substance pollution prevention, as well as air and water quality.

On June 12, 2025, the Government Accountability Office (GAO) released their report examining the status of the Joint Pipeline Office (JPO), the group of federal and state agencies formed after the Exxon Valdez oil spill that oversees TAPS, including the terminal. In 2023, Senators Lisa Murkowski and Dan Sullivan asked the GAO to conduct this assessment, following a Council-sponsored report by Billie Garde,

which raised similar concerns. The Council has been raising concerns about the diminishment of agency oversight at the terminal for over 15 years.

In 2024 and 2025, Council reviewed multiple Alyeska reports and documents related to non-destructive testing methods that were being evaluated and considered for use in verifying the integrity of the secondary containment system installed in the East Tank Farm of the VMT. Council staff, technical committees project teams, and contracted subject matter experts reviewed and provided comprehensive and technical analysis and recommendations on these reports to support ADEC's regulatory decision related to the verification of the integrity of this now close to 50-year-old oil spill prevention measure.

The Council was encouraged to see recommendations in the GAO report to clarify roles and responsibilities within the JPO. However, the report falls short of adequately characterizing the reduction in meaningful technical and comprehensive monitoring by the JPO that existed when it was first established. The Council looks forward to further conversations with the Alaska Congressional Delegation, regulatory agencies, and industry to determine what the next steps might be, in the interest of supporting the JPO (see page 8 of the annual report).

Council projects from 2023-2025 focusing on the integrity of the VMT's crude oil piping and various storage tanks also relied on the review of various Alyeska reports including annual facility monitoring reports, cathodic protection monitoring reports, and tank inspection reports. The Council's LTEMP involves reviewing environmental monitoring reports sponsored by Alyeska as well as reports by ADEC regarding oil spills in PWS.

Council staff review industry reports daily. Every morning PWSRCAC staff receive and review two reports from Alyeska, one regarding the tanker shipping schedule, and the other regarding the availability of larger spill response vessels and assets like response barges and tugs in PWS. These daily reports are used by the Council to monitor the operations of the VMT and associated tankers, and monitor spill response readiness in the region.

e. Conducting or reviewing necessary scientific studies with or by recognized experts in the field under study.
Describe/Examples:

This aspect of PWSRCAC's activities is discussed in detail under Section 3, "Scientific Work," above. The Council conducts or funds many scientific studies designed to understand the actual and potential environmental impacts of the VMT and associated tankers. These studies are either conducted directly by or guided by recognized experts in the field under study. One example is the Council's LTEMP study, which monitors for oil contamination in Port Valdez and PWS, initiated in 1993. LTEMP sampling is conducted annually by staff and scientists with expertise in

environmental forensic chemistry and toxicology. Results are summarized in a year-end report (see page 15 of the annual report). In 2024, a Council-sponsored pilot study identified 23 metals found in sediments near two monitoring sites in Port Valdez. The study noted that sediments near the terminal held higher amounts of metals than the reference site at Gold Creek. The analysis showed that some of the metals could be above the threshold for negative effects. Further monitoring and analysis are recommended.

In another example, Council staff, volunteers, and interns annually monitor near PWS communities for marine invasive species that could be introduced by oil tankers. Additional, more remote, monitoring is occasionally conducted by the Smithsonian Environmental Research Center (SERC), which also serves in an advisory capacity. In September 2024, the Council released a report describing a 2023 survey that searched for invasive species in PWS. Three species of concern were detected in this study, two of which had not been recorded in PWS in previous studies.

The Council stays up to date on scientific studies conducted by external entities relevant to understanding the potential environmental impacts of the VMT and associated tankers. Such reviews are conducted using two methods: (1) the Council contracts with recognized experts to conduct scientific literature reviews, and (2) the Council sends its volunteers (some of whom are recognized experts) and staff to scientific conferences. In 2025, contractor Dr. Morgan Powers attended two conferences to present on the Council's Long-Term Environmental Monitoring Program: a poster at the Alaska Marine Science Symposium and a talk at the Society of Environmental Toxicology and Chemistry Pacific Northwest Chapter meeting.

The Council annually sends staff and volunteers to scientific conferences including but not limited to Alaska Invasive Species Partnership workshop (AKISP, 2022-2025), Arctic and Marine Oil Spill Program (AMOP, 2023), Clean Waterways (2023), International Conference on Marine Bioinvasions (2023), International Conference on Aquatic Invasive Species (ICAIS, 2024), Science Talk (2024), and the International Oil Spill Conference (IOSC, 2024) to learn more from recognized experts about topics related to the actual and potential environmental impacts of oil transportation.

5. Efforts to prevent oil spills and to plan for responding to, containing, cleaning up, and mitigating impacts of oil spills. The Coast Guard will review the extent to which the advisory group:

a. Periodically reviews the respective oil spill prevention and contingency plans for terminal facilities and for crude oil tankers while in Prince William Sound, in light of new technological developments and changed circumstances;
Describe/Examples:

PWSRCAC continues to participate in reviewing federal, state, and industry contingency plans. These plans include the Alaska Regional Contingency Plan, the Arctic and Western Alaska Area Contingency Plan, the PWS Area Contingency Plan, the Alaska Inland Area Contingency Plan, and industry plans covering the PWS Tankers and the terminal.

During this recertification period, PWSRCAC staff, volunteers, and contractors took substantial time and effort to participate in, through review and comments, the five-year renewal for the VMT contingency plan, a major amendment to the core Prince William Sound Tanker contingency plan, as well as new submissions of individual Prince William Sound tank vessel oil discharge and prevention contingency plans for prospective future Alaska North Slope crude oil shippers like Santos, SeaRiver, Teekay, and Repsol.

Since November 2022, a task force set up by the Alaska Regional Response Team has been working on a set of "job aids" to support a Regional Stakeholder Committee (RSC), under the Incident Command System structure. Council staff have participated in this task force along with ADEC, EPA, USCG, CIRCAC, Native groups, other NGO's and industry. In the event of a large oil spill, the RSC process creates a formal way for local citizens directly affected by the spill to share their local knowledge and resources with the agency and industry representatives, and with the decision-makers supporting the oil spill response. The task force's goal is to ensure a consistent and effective process across the state, by providing job aids for both responders managing the incident, and community members stepping into an RSC role.

b. Monitors periodic drills and testing of the oil spill contingency plans for the terminal facilities and for crude oil tankers while in Prince William Sound;
Describe/Examples:

PWSRCAC is directly tasked under OPA 90 and our Alyeska contract to monitor and report on spill response trainings and exercises, including attendance at field deployments and large tabletop exercises with Alyeska, PWS Shippers, ADEC, and USCG. Staff and contractors are also frequently involved as members in industry exercise evaluation teams for these drills and exercises. The after-action reports generated from Council participation in drills and exercises are shared with our OSPR Committee, and ultimately summarized and shared with the PWSRCAC Board, industry and governmental partners, and the public through annual drill monitoring reports.

With approximately 350 vessels on contract with Alyeska throughout our region to perform spill response, PWSRCAC spends a substantial amount of staff time monitoring Alyeska/SERVS fishing vessel program. Some of this interaction comes from monitoring drills and exercises where these vessels are involved, or in

attending annual SERVS' trainings in communities in our region. In addition, a subset of vessels participate in specialized training for wildlife response operations. In 2025, staff observed trainings and deployment events in Cordova, Homer, Whittier, and Valdez.

During the timeframe of this application, the Council has sponsored and released two analyses of the properties of Alaska North Slope (ANS) crude oil. The Prince William Sound tanker operators provide a crude oil sample to the Council approximately every five years. The Council conducts this analysis on a regular basis because properties such as density and viscosity can vary, depending on the location from where the oil is extracted and the age of the field. The final interpretation of the analysis examines properties that would affect oil spill response measures including mechanical (e.g., booms, skimmers) and non-mechanical (e.g., dispersants). In 2019, the Council initiated a laboratory analysis, though the final data was not received until 2022, after delays due to the COVID-19 pandemic. The final report was issued in 2023. In 2025, the Council released a report on an analysis for physical and chemical properties of a sample of 2024 ANS crude oil. ANS crude oil has been trending lighter since around 2010, and its properties are consistent with a "medium" weight oil. Compared to previous samples, the current composition is less prone to emulsify, less dispersible as the oil weathers, and less adhesive to shorelines.

c. Studies wind and water currents and other environmental factors in the vicinity of the terminal facilities which may affect the ability to prevent, respond to, contain, and clean up an oil spill;
Describe/Examples:

As previously noted, PWSRCAC cooperatively supports the operation of two weather stations in the greater PWS region and the Gulf of Alaska. Information is collected via the PWS Weather Station Network, developed and maintained by the PWSSC, and co-funded by the Council. Data is available through the PWSRCAC, PWSSC, and AOOS websites. The Council also maintains two metocean weather buoys in Port Valdez: one at the VMT and the other which was at the Valdez Duck Flats until recently but is currently awaiting redeployment. This data is being used to help guide response planning in case of a spill at the VMT and better understanding of seasonal changes in water circulation (see page 6 of the annual report).

Additionally, through a grant from AOOS to improve marine safety in PWS, the Council purchased and installed a CTD (conductivity, temperature and depth) sensor at the Kelsey Dock in Port Valdez. The Council received help from the NOAA Tide Gauge Office in Seattle to prepare their National Water Level Observation Network (NWLON) station to accept data from the sensor. Water parameter data is now being provided to the AOOS, NWLON, and NOAA PORTS® websites, making it

readily available to the public. As part of this partnership, PWSRCAC has performed minor repairs at the NWLON station as needed, preventing the need for NOAA personnel to travel to Valdez to maintain functionality of their equipment.

The most recent addition to the weather station network was installed at Kokinhenik Bar on the Copper River Delta in June 2023. The Copper River Valley can funnel extremely high offshore winds when there is a high-pressure system over interior Alaska and a low-pressure system over the Gulf of Alaska. This weather station provides real-time observations of wind and other weather parameters, which are available to traffic transiting through the shipping lanes 20 nautical miles to the southwest and can be used in the event of an oil spill. Data collected complements the existing Council weather station at Cape St. Elias and SNOTEL weather station on Strawberry Reef, both of which tend to under-report northerly winds.

d. Identifies highly sensitive areas which may require special protection in the event of a spill in Prince William Sound;
Describe/Examples:

PWSRCAC is involved with the GRS deployments that Alyeska conducts annually in conjunction with representatives from other agencies, such as ADEC and USCG. Reports are generated from these efforts so that GRS tactics can be updated and improved.

In 2022, the Council commissioned a report documenting the status and history of developing GRS for the Copper River Delta and Flats region, a process which began in the late 1990s. Since that time, the Council has led a collaborative workgroup effort to update the GRS connected to that area. The Copper River Delta hosts numerous species, cultural sites, and important fisheries, but can also be a challenging operational area with high energy beaches, shallow tidal waters, and ever-changing channels, barrier islands, and braided river drainages. Staff recently led several open house meetings in Cordova to discuss this project and the feasibility of protecting this area from the impacts of an oil spill with local mariners familiar with the area. Site visits via vessel and helicopter were also conducted as part of the project. Finalized GRS are set to be transmitted to ADEC in early 2026. Local interest in this project is high and many of those involved in the workgroup process are from Cordova.

One of the Council's scientific studies during this application period focused on identifying areas where bird populations congregate in PWS during the non-breeding season. In September 2024, the Council released a report that combined 14 years of data showing areas where marine birds tend to gather in the spring. Primary areas identified for prioritized protection were Hinchinbrook Entrance, the head of Port Valdez, the Knowles Head anchorage area, and the Southwest

Passages. In May 2025, the Council released a report on new surveys conducted in September and November 2024 in and around the tanker escort zone and the terminal. These fall surveys found the densest bird populations in Port Valdez and Hinchinbrook Entrance. Fewer birds were observed in November, and the species composition shifted dramatically. This was the first of four proposed years of surveys during the fall and early winter. Data from spring and fall surveys have been incorporated into NOAA's online spill response planning tool, the Environmental Response Management Application (ERMA) (see page 16 of the annual report). The data from these projects can be used to inform environmental agencies and Unified Command decision makers during an oil spill response.

e. Periodically reviews port organization, operations, incidents and the adequacy and maintenance of vessel traffic service systems designed to assure safe transit of crude oil tankers pertinent to terminal operations;
Describe/Examples:

PWSRCAC staff monitor maritime operations and, in conjunction with the PWSRCAC Port Operations and Vessel Traffic Systems Committee, analyze issues and make recommendations for improving the navigational safety of TAPS tankers and escort vessels. These activities are carried out by routine tracking of vessel traffic with the assistance of Automatic Information System (AIS) data monitored in PWSRCAC's Valdez office; recording vessel delays, incidents, near misses, and atypical situations; reviewing proposed rules, regulations, and USCG guidelines; and maintaining a working relationship with shippers, SERVS, ADEC, and USCG. As described previously, PWSRCAC also reviews and comments on state and federal oil spill prevention and response plans, often including recommendations regarding port operations and safety systems. Council staff also regularly monitor certifications, documentation, and USCG contacts for tank vessels loading at the VMT through the USCG Maritime Information Exchange Port State Information Exchange website.

In 2024, the Council partnered with the City of Valdez to hold a workshop to further understand the risks that tsunamis could pose to mariners and vessels, including those generated by landslides. Information collected from the workshop was compiled into a summary report containing guidance for vessel operators on tsunamis. The report also included a list of potential future research topics. Attendees included representatives from local, state, and federal governments; academia; and industry. The Council's interest in this issue stems from potential impacts a tsunami could have on oil spill response vessels and crew safety located near areas susceptible to tsunamis.

In recent years, the Council has been voicing support for NOAA's National Data Buoy Center to receive additional funding for timely repairs to Seal Rocks (Station 46061) and the other important weather buoys in the Gulf of Alaska. Seal Rocks has been plagued by outages and data problems since December 2023, and was only briefly functional in fall 2024.

The Seal Rocks buoy collects and transmits data about weather conditions near Hinchinbrook Entrance. Outbound laden tankers are not allowed to transit Hinchinbrook Entrance when winds exceed 45 knots or seas exceed 15 feet. Wind and wave data from this buoy is the primary source of information that USCG uses to make critical navigation safety decisions for these tankers.

Council staff provided support in drafting the language and were invited to provide testimony at Alaska Legislature committee hearings on a resolution urging the U.S. Congress and NOAA to address outages of weather stations and buoys in Alaska. The resolution passed in spring 2025. The Council also made the NDBC weather buoys, including the Seal Rocks buoy a federal legislative priority and advocated for the Alaska Congressional Delegation's support needed by NOAA and NDBC to keep these buoys operational. The Council is pleased to report that the Seal Rocks buoy and others in the region were repaired or replaced and operating properly in June 2025 (see page 7 of the annual report).

In 2023, the U.S. Coast Guard announced that the Island-class cutter Liberty, homeported in Valdez, would be decommissioned and not replaced. The Council urged the Coast Guard to replace the vessel. In 2024, the Council continued to advocate for a new cutter for Valdez, per a request from Sen. Dan Sullivan. The Council's Board of Director's approved a Resolution that advocated for a replacement Coast Guard cutter in Valdez. On July 11, 2025, the cutter Blacktip arrived in Valdez to replace the Liberty (see page 11 of the annual report).

f. Periodically reviews the standards for tankers bound for, loading at, exiting from, or otherwise using the terminal facilities.
Describe/Examples:

The Council provides comments when individual oil shipper contingency plans are renewed every five years, and on any major plan amendments proposed by the shippers between formal renewals. Additionally, the Council reviews specific concerns, such as emission standards for tankers and corrosion inspections. PWSRCAC participated in the review of a major amendment to the PWS Tanker Contingency Plan to address regulatory changes made in 2023, which was subsequently approved in 2024. PWSRCAC has long been active on the issue of reducing the risk of tanker-related invasions by invasive species into PWS, including reviewing and commenting on relevant regulations and legislation at the state and federal levels.

In 2023, the Council commissioned an analysis of the current and potential future environmental regulations which would affect tankers and the escort tugs that transit Prince William Sound. The report reviewed regulations in the U.S. and around the world on emissions commonly generated by ocean-going vessels and the types of fuels they use.

Since 2022, the Council has been examining the issue of vessel speed reductions to reduce whale strikes through its Scientific Advisory and Port Operations and Vessel Traffic Systems committees. In more recent discussions, the Council's Board has expressed concerns and questions about protecting whale populations from impacts of the oil industry in our region. Some considerations of the Board and committees have included current speed limits for laden oil tankers; how slower speeds could reduce air emissions and underwater noise pollution from tankers; and possible logistical constraints that could be imposed by a slowdown. In 2024, the Council sent advisory letters to appropriate regulatory agencies and the Prince William Sound oil shipping companies, conveying the Council's concerns related to vessel-whale strikes within our region and acknowledging the known benefits of reduced vessel speeds.

In 2025, the Council funded a pilot project to purchase a thermal imaging camera that can automatically identify whales at distances of up to 4 nautical miles and provide real-time alerts to the vessel's bridge. This would allow the vessel crew to perform a minor course adjustment or a limited duration speed reduction to avoid whales in the ship's path with minimal effect on their operations. The Council hopes to purchase and install this camera system on one of the tank vessels that regularly visits the VMT in 2026, however, discussions with the TAPS shipping companies are ongoing and no agreement has been reached at this time.

In 2025, the Council released a report assessing the likelihood of invasive species biofouling on vessels arriving within our region. The report compared the risk posed by six classes of large commercial vessels that visit the region: tankers, cruise ships, container ships, cargo ships, bulk carriers, and roll-on/roll-off cargo vessels. This study will help focus future research and monitoring efforts (see page 16 of the annual report).

g. Reports findings to local industry, and to responsible State and Federal officials. Describe/Examples:

The Maritime Operations Program monitors and reviews port organizations, operations, incidents, and the vessel traffic system, interacting with industry and regulators to share PWSRCAC findings, concerns, and issues. PWSRCAC also participates in the Valdez Marine Safety Committee, which is discussed elsewhere in this application.

6. Funding. The Coast Guard will determine whether the advisory group has entered into a contract for funding in accordance with the requirements of 33 U.S.C. 2732(o) and will review the advisory group's expenditure of those funds.
X Yes __ No Describe:

PWSRCAC's primary income source is a long-term contract with Alyeska Pipeline Service Company. In PWSRCAC's fiscal year 2025, the amount was approximately $4.27 million. Occasionally, PWSRCAC also receives grant funds for specific projects. In 2025, PWSRCAC received a donation from Repsol to co-sponsor a reception in conjunction with our September Board meeting in Cordova. Enclosed are copies of the Alyeska contract along with the current three-year funding addendum to the contract.

Expenditures of funds may be made only on those projects or activities that foster the goals and purposes of the Act. Projects or activities may include those that develop information based on sound scientific and engineering principles that the community can use to improve its ability to prevent or respond to oil spills, or to expand the knowledge base of environmental information related to terminal or tanker operations. The Coast Guard will review the purpose and impact of each project or activity to determine whether:

a. Expenditures and controls are carried out in a manner consistent with sound business practices;
X Yes __ No Describe: A copy of our most recent third-party financial audit is enclosed.

PWSRCAC's audited financial statements and Form 990 (Return of Organization Exempt from Income Tax) are made available to the public on the Council's website.

b. Expenditures are reasonably related to the prevention or response to oil spills from tanker or terminal operations, including environmental information, in the advisory group's area of responsibility.
X Yes __ No Describe:

PWSRCAC has processes in place to ensure compliance with the Alyeska contract and with the requirements of the Oil Pollution Act of 1990, and both the Executive Director and Director of Finance report annually to the Board of Directors about such matters. Alyeska reserves the right to audit PWSRCAC for contract compliance. PWSRCAC is allowed to conduct activities outside the scope of the Alyeska and OPA 90 so long as Alyeska contract funds are not used for these activities.

7. Accessibility of Application. The Coast Guard's review will include an examination of the extent to which the advisory group provided notification to the public via local press releases that it has applied for certification and, the extent to which the advisory group has ensured that the application is accessible for public review.
Describe:

PWSRCAC will inform the public of its recertification application through news releases (see Attachment 2) and via notifications to recipients on various PWSRCAC email lists. Copies of the application will be available on the PWSRCAC website and free in printed form by request to the PWSRCAC offices in Anchorage and Valdez.

Attachment 1
Supplement to Section 3, "Scientific Work"
PWSRCAC Recertification Questionnaire
Nov. 17, 2025
Summary of Reports Produced and Experts Consulted

Reports produced overview

2022 Tank Pressure/Vacuum Pallet Damage: Crude Oil Storage Tank Headspace Gas Assessment. Taku Engineering. December 2024.

2024 Sediment Metals Report: A pilot study of the Long-Term Environmental Monitoring Program. Fjord & Fish Sciences. January 2025.

23rd Annual Subsistence Memorial Gathering Workshop. Danielle Verna and Davin Holen. August 2025.

Assessing the likelihood of non-indigenous species biofouling on vessel arrivals within the Exxon Valdez oil spill region. Alaska Pacific University. May 2025.

Assessment of Risks and Safety Culture at Alyeska's Valdez Marine Terminal. Clifford & Garde, LLC. April 2023.

Coping with Technological Disasters – Peer Listener Training Manual. PWSRCAC. September 2023.

Crude Oil Storage Tank Vent Snow Damage Report. Taku Engineering. June 2023.

Examining the Effectiveness of Ballast Water Treatment Processes: Insights into Hydrocarbon Oxidation Product Formation and Environmental Implications. Pontchartrain Institute for Environmental Sciences, University of New Orleans. September 2023.

Exploring Miscommunication at Sea: Causes and Contributing Factors. Dr. Nicole Ziegler. August 2024.

Long-Term Environmental Monitoring Program 2022-2023 Summary Report and Technical Supplement. Owl Ridge Natural Resource Consultants. December 2023.

Long-Term Environmental Monitoring Program 2024 Summary Report & Technical Supplement. Fjord & Fish Sciences. December 2024 and February 2025.

Marine Bird Hotspots in Prince William Sound. Prince William Sound Science Center. July 2024.

Marine Bird Winter Surveys in Prince William Sound. Prince William Sound Science Center. June 2023 and March 2025.

Methodologies for Evaluating Defects in the Catalytically Blown Asphalt Liner in the Secondary Containment System at the Valdez Marine Terminal. Dr. Craig H. Benson. November 2022.

Miscommunication in Maritime Contexts. Dr. Nicole Ziegler. December 2023.

Miscommunication in Maritime Contexts: Insights from Phase 1 and 2. Dr. Nicole Ziegler. November 2024.

Peer Listener Training Manual. Agnew::Beck Consulting, Inc. August 2023.

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Attachment 2
News Release
PWSRCAC Recertification Questionnaire
Nov. 17, 2025

Prince William Sound Regional Citizens' Advisory Council

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Anchorage Alaska 99503	Valdez, Alaska 99686
907-277-7222/Fax: 907-277-4523	907-834-5000/Fax: 907-835-5926

News Release *DATE*

Contact: Brooke Taylor
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907-273-6228

Recertification application available for public review

The Prince William Sound Regional Citizens' Advisory Council is seeking recertification as the alternative voluntary advisory group for Prince William Sound, as authorized under the Oil Pollution Act of 1990 (OPA 90). The application has been submitted to the U.S. Coast Guard, which is charged with assessing whether the council fosters the general goals and purposes of OPA 90 and is broadly representative of communities and interests as envisioned under OPA 90.

The recertification application is available for public review on the council's website at www.pwsrcac.org. To obtain a printed copy, contact the Prince William Sound Regional Citizens' Advisory Council, 2525 Gambell St., Ste. 305, Anchorage, Alaska 99503. Call (907) 277-7222 or toll-free (800) 478-7221.

Comments on the application should be sent to:
Commander, Coast Guard Arctic District (dpi)
PO Box 25517
Juneau AK 99802

Attn: LT Case Kuikhoven
Inspections & Investigations

Comments may also be emailed to LT Case Kuikhoven at Case.A.Kuikhoven@uscg.mil .

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The Prince William Sound Regional Citizens' Advisory Council, with offices in Anchorage and Valdez, is a federally mandated, independent nonprofit corporation whose mission is to promote the environmentally safe operation of the Valdez Marine Terminal and the oil tankers that use it.

The council's work is guided by the Oil Pollution Act of 1990, and its contract with Alyeska Pipeline Service Company. The council's 19 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as aquaculture, commercial fishing, environmental, Alaska Native, recreation and tourism groups.

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