



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

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**MEMBERS** December 23, 2020

Alaska State Chamber of Commerce

Commander, 17th Coast Guard District  
Attn: LT Ian McPhillips (dpi), Room 753  
P.O. Box 25517  
Juneau, AK 99802

Chugach Alaska Corporation

City of Cordova

**SUBJECT:** Prince William Sound Regional Citizens' Advisory Council Recertification Application for January - December 2020

City of Homer

Dear Sir/Madam:

City of Kodiak

City of Seldovia

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC or the Council) hereby applies for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

City of Seward

City of Valdez

City of Whittier

This application is submitted under the guidelines in the U.S. Coast Guard's September 16, 2002, Federal Register notice which established a streamlined recertification process for two years out of every three. The notice stated that a streamlined application need only "describe any substantive changes to the information provided at the last triennial recertification." The year covered by this application falls under the guidelines for the streamlined process.

Community of Chenega

Community of Tatitlek

Cordova District Fishermen United

Substantive changes for 2020 are summarized below.

**Broad Representation and Involvement in the Region**

Kenai Peninsula Borough

Board membership continues to remain strong with 18 of 19 seats filled. Staff are working with local leaders to fill the remaining seat for the Kodiak Village Mayors Association. New citizen volunteers have been added to our technical committees.

Kodiak Island Borough

Kodiak Village Mayors Association

For most of this past year, public receptions were impossible given the restrictions on group gatherings and travel due to the COVID-19 pandemic. Before the shutdown, the Council presented at public meetings in Kenai and Kodiak. Our January Board meeting was held in person in Anchorage as usual. Board meetings which would have been held in Valdez in May and Seward in September were facilitated online. Staff pivoted rapidly and successfully to using videoconferencing software for all public meetings. Announcements for meetings were provided beforehand.

Oil Spill Region Environmental Coalition

Port Graham Corporation

Prince William Sound Aquaculture Corporation

## **Partnerships with Stakeholders and Affiliates**

### *Weather Data, Weather Gap Analysis and Forecast Models*

These projects study wind, water currents, and other environmental factors near the Valdez Marine Terminal (terminal), in Prince William Sound, and the Gulf of Alaska as these factors may affect the ability to prevent, respond to, contain, and clean up an oil spill. The Council supports two weather stations, one in Prince William Sound and the other in the Gulf of Alaska. Information is collected via the Prince William Sound Weather Station Network, which is developed and maintained by the Prince William Sound Science Center. The Council co-funds this network. Weather data is shared with the Alaska Ocean Observing System, making it readily available to the public.

The Council also assembled, deployed, and maintains two weather buoys in Port Valdez. These buoys measure ocean currents, waves, and other common weather parameters. The first buoy is installed near Jackson Point, offshore of the Valdez Marine Terminal. The second buoy is installed near the Valdez Duck Flats. The Council partnered with the Prince William Sound Science Center and City of Valdez for this project and works with the Alaska Ocean Observing System to share the buoy data regionally.

These buoys provided the opportunity for the Council to coordinate with the National Oceanic and Atmospheric Administration (NOAA) to establish a PORTS® (Physical Oceanographic Real Time System) site for Port Valdez. According to NOAA, their system “improves the safety and efficiency of maritime commerce and coastal resource management.” The system integrates real-time environmental observations, forecasts and other information that mariners need to navigate safely. The NOAA PORTS® site, which came online in 2020, is using the Council’s buoy data along with information from their weather stations and tide gauges located in Port Valdez.

## **Toward More Effective Communications**

### *Regular Meetings with Alyeska Senior Managers and Marine Safety Unit (MSU) Valdez*

Over this past year, Council staff has continued a series of monthly meetings with senior leaders from Alyeska and Alyeska’s Ship Escort/Response Vessel System (SERVS). Council staff also coordinates with the Commander of the local MSU in Valdez and participates on the Valdez Marine Safety Committee. Commander Patrick Drayer, Captain of the Port and Federal On-Scene Coordinator for Prince William Sound, regularly attends Council Board meetings, while other MSU Valdez representatives regularly attend Council technical committee meetings. The intent and success of these regular meetings has been to review substantive issues of mutual concern; share ongoing projects, research, and priorities; explore opportunities for alignment and cooperation; and encourage open communications.

### *Strengthening Ties with Citizens’ Councils*

The Council continues to strengthen our working relationship with Cook Inlet RCAC, as noted by the Coast Guard in 2015, including regular meetings between the executive directors, joint letters on issues of importance to the councils, and attendance at volunteer and community events. Both councils also coordinated

extensively to raise public awareness and participation in the Alaska Department of Environmental Conservation public scoping process that concluded in March of 2020. Since the COVID-19 pandemic struck, both councils strive to virtually attend each other's Board of Directors meetings to stay apprised of the issues and concerns that are important to both regions and to look for ways to support one another. Working toward the goal of collaboration and trust between the citizens' councils is a priority for PWSRCAC and efforts are expected to continue in this direction.

### *Collaboration with Partners*

With regard to the Council's relationships with other regulators and industry, Council staff continue to meet monthly with ADEC, as well as from time to time with Bureau of Land Management (BLM) and other PWSRCAC ex-officio members. Additionally, the Council continues to participate in the quarterly Valdez Marine Terminal Coordination Workgroup meetings attended by Alyeska, ADEC, BLM, the U.S. Coast Guard, and the Environmental Protection Agency (EPA). This workgroup has met since 2003, and is tasked with providing an open forum for communicating on the terminal contingency plan with a goal of continuous improvement to the plan.

This year the Council conducted its annual meeting with the Interagency Coordinating Committee on Oil Pollution Research (ICCOPR) by video conference. ICCOPR participants included the Acting Executive Director and numerous member agency representatives. The Council was represented by the Executive Director, the Board President, and members of the Scientific Advisory and Legislative Affairs Committees. This annual meeting serves as a great opportunity for ICCOPR and the Council to share ideas, discuss current and past research projects, and explore areas for possible collaboration.

We recognize that positive relationships and communications are critical components to achieving our mission. The Council Board and staff remain committed to strengthening and continuing to build relationships with our stakeholders, industry, and regulatory partners.

### **Dispersants**

#### *Tracking Research on Dispersants*

Every year, the Council updates a comprehensive database of research about dispersants. To complement the database, the Council also develops an overview of recent science on dispersants every few years to document key themes, trends, and areas where research is lacking. In 2020, 129 articles were added, bringing the total number of peer reviewed articles to over 1,700 in the Council's dispersants research bibliography. The bibliography now includes articles from 1981 through 2020 and is available on request. This is an important source of information the Council will consider when making future updates to its chemical dispersants position.

### **Oil Spill Prevention**

#### *Vessel Traffic Services: Review of Technology, Training, and Protocols*

In response to a 2016 National Transportation Safety Board report, "An Assessment of the Effectiveness of the US Coast Guard Vessel Traffic Service System," the Council commissioned a review of the system in Prince William Sound. The researchers

reviewed the best available technology in the field and how that technology, as well as practices and procedures, compare to what is used in Prince William Sound. The study's recommendations include suggestions for the U.S. Coast Guard to conduct repair and maintenance of radar and radio equipment used in the Sound; ensure specific on-the-job training is sufficient to allow personnel to understand unique geography and vessel activity found in the Sound; and develop better ways to send safety messages to area fishermen and other stakeholders in a timely manner.

#### *Towing a Tanker in Distress: Review of Technology for Deploying Towlines*

In 2020, the Council released a report evaluating delivery devices and best use practices for passing a messenger line to set up a tow line between a tug and a tanker in distress, a process which can be difficult and dangerous in poor weather conditions. Little research has been done to evaluate the best methods to make this safer and easier. Researchers reviewed commercially available devices for deploying messenger lines, then developed criteria to evaluate the equipment according to effectiveness, feasibility, transferability, compatibility, age and condition, availability, environmental impacts, and cost.

### **Monitoring Terminal Operations and Maintenance**

#### *Oil Spill Monitoring*

After a sheen was reported in the vicinity of the Valdez Marine Terminal on April 12, 2020, Council staff spent considerable time monitoring the response efforts and evaluation of causes conducted by Alyeska to this approximately 1,400 gallon spill. After the event, Alyeska conducted a thorough investigation of the cause, response, and ongoing clean up work. From the Council's perspective, it appears that overall, the response to this spill was appropriate. Resources were deployed quickly and sensibly, and local environmentally sensitive areas were prioritized for protection. While no amount of oil spilled to water is acceptable, the Council took the opportunity to learn from the event in order to promote measures designed to prevent and respond to oil spills from the terminal in the future.

#### *Long-Term Environmental Monitoring*

Every year the Council collects environmental samples and has them chemically analyzed for oil contamination related to the operation of the Valdez Marine Terminal. The sampling includes retrieving blue mussels, marine sediments, and special plastic strips (called passive sampling devices), then having them all chemically analyzed for oil contamination. The report released this year covered information from mussels, marine sediments, and passive sampling devices collected from around Port Valdez in 2019. The chemical analysis of the mussels showed that Port Valdez was "exceptionally clean" compared to other parts of Alaska and the United States. The passive sampling device results showed that water column concentrations of oil contamination were "well below any known toxicity thresholds for sensitive marine organisms and life stages." The marine sediment results showed relatively low levels of oil contamination in Port Valdez, but the signature of the Valdez Marine Terminal could still be detected in the sediment samples.

### *New Genetic Testing Method Evaluated*

Recently, the Council investigated a new genetic testing method, called transcriptomics, which involves analyzing the genetic profiles of blue mussels. Certain genes in the mussels get turned on or off in response to oil contamination and other environmental stressors. The most recently collected data from 2019 showed Port Valdez mussels had elevated expression of genes associated with oil contamination compared to relatively clean, remote locations in Prince William Sound.

### **Combating Invasive Species**

The Council has worked closely with stakeholders, other western states, and state and federal legislators regarding marine invasive species. This work includes outreach and information dissemination on topics such as current research, ballast water regulations, and ballast water treatment equipment advances and best management practices. The Council has been particularly concerned with preventing the potential introduction of invasive species into Prince William Sound associated with oil tanker ballast water exchange and hull fouling. Several years ago, the Council worked with its federal legislative consultant and the Alaska Congressional Delegation on the draft Vessel Incidental Discharge Act (VIDA). The Council's primary focus was to eliminate the exemption from Coast Guard ballast water regulations that existed for "coastwise" tankers transiting between Valdez and U.S. West Coast ports.

The final VIDA legislation included the elimination of this exemption. It was passed by Congress and signed by the President. The EPA is in the process of drafting regulations to implement VIDA water quality standards. The Council has been following this process closely and in November of this year, submitted comments to the EPA on the draft proposed regulations. Phase two of regulation development will be conducted by the U.S. Coast Guard and will address invasive species management, equipment, and enforcement. The Council will be monitoring and engaged in this phase as well.

The Council has been involved in other ongoing invasive species initiatives. Over the past few years, the Council has supported several versions of a bill addressing invasive species that was introduced in the Alaska Legislature. Council staff are presently serving on a working group formed by a member of the House of Representatives to refine and strengthen a bill she introduced in the last session. The Council also conducts annual sampling and tests to monitor for invasive species in the Port of Valdez and other locations within Prince William Sound as part of its long-term environmental monitoring program.

### *Plankton Testing*

Primarily, the Council has used plastic plates and crab traps to monitor for invasive species, but in recent years, more high-tech methods have been added. Since 2016, the Council has partnered with the Prince William Sound Science Center in Cordova to collect plankton samples in Port Valdez and Prince William Sound. The samples are genetically analyzed to identify invasive species. That genetic analysis found one non-native clam and sea squirt in 2016, but in 2017, 2018, and 2019 no non-native or invasive marine species were detected.

## **Preparing to Respond to Oil Spills**

### *Drills and Exercises*

PWSRCAC continues to monitor, evaluate, and participate in exercises and training events each year for the Prince William Sound tankers and the terminal. Not only do Council staff observe and evaluate, but they are also part of the teams that helps in drill design and planning. Staff participated in two different exercise-and-training-related field events in 2020. While there has been a noted reduction in exercises due to COVID-19 precautions, the Council also spent nearly a month monitoring the Alyeska Valdez Marine Terminal administrative sump spill response in April and May.

### *Aerial Surveys for Herring and other Forage Fish*

If an oil spill were to occur, it is important to understand how it might affect marine life. This past year, the Council partnered with the Prince William Sound Science Center, conducting aerial surveys to find out where herring and other “forage fish” congregate. These small fish have a key role in the marine ecosystem and make up an important part of the food chain. These forage fish are prey for salmon and other larger species that are important to Alaska’s economy as well as local citizens who depend on these species for food. In recent years, herring populations in Prince William Sound have crashed to all-time low levels. Through these surveys, the Council hopes to better understand where the remaining populations of forage fish congregate in order to protect them in case of an oil spill. In 2019, relatively few schools of herring and other forage fish were observed in Prince William Sound compared to previous surveys.

### *Efforts Around the Reauthorization of the Oil Spill Liability Trust Fund (OSLTF)*

The Council continued to work with its federal legislative consultant and the Alaska Congressional Delegation on Oil Spill Liability Trust Fund (OSLTF) program amendments and reauthorization of the financing rate. Authorization for the most recent extension of the financing rate was set to expire on December 31, 2020, but was extended to 2025 this month. Senator Dan Sullivan has introduced, co-sponsored by Senator Murkowski, the Spill Response and Prevention Surety Act. This bill, if enacted, will provide for long-term Fund sustainability. It will also incorporate many of the program amendments the Council has recommended, including a grant program for prevention activities.

### *Coordination with Alaska’s Congressional Delegation*

The Council has also communicated with the Delegation on several other pressing concerns that are directly related to oil spill prevention and response. The Council submitted letters and conveyed its concerns through other channels about what it sees as rapidly increasing risk factors that might contribute to a major oil spill. These factors include: government and industry complacency; rollbacks in state and federal regulations and oversight pertaining to oil spill prevention and response; and severe budget and staffing reductions at relevant state and federal regulatory agencies. The Council also conveyed its concern about obsolete and inoperable radar and VHF equipment in Prince William Sound.

## **Valdez Marine Terminal and Prince William Sound Tanker Contingency Plans**

The Council continues to participate in reviewing the contingency plans for the Valdez Marine Terminal and oil tankers in Prince William Sound. In the last year, the Council reviewed proposed amendments to the terminal plan, participated in the related workgroup, and submitted comments that addressed sensitive area protection.

Regarding the contingency plan for the Prince William Sound tankers, the Council monitored the change in ownership from BP Oil Shipping to Hilcorp North Slope, as well as the foreign flagged vessels transiting Prince William Sound.

In addition to industry contingency planning, the Council provided comments on the State of Alaska regulatory reform effort for oil spill prevention and response statutes and regulations, the Alaska Regional Response Team's wildlife protection guidelines, and the Alaska Inland Area Contingency Plan.

## **Sharing information on our work**

Council staff and volunteers typically visit communities in our region, attend group member functions, give presentations, coordinate special events, and encourage citizen involvement in the Council's work throughout the year. In person outreach work for this year was curtailed significantly as a result of the COVID-19 pandemic, allowing staff to focus on internal projects in support of long-term outreach objectives. Virtual events were also sought to share Council information and connect with communities in our region.

### *Youth Involvement Program*

The Council partners with educational organizations to share topics related to our mission with students from our region. This year, the Alaska Oil Spill Curriculum, which is used by formal and informal educators around the region, was updated to match new state and national science standards. Other funded opportunities for youth included marine technology activities for youth in Kachemak Bay and at the Alaska Tsunami Bowl in Seward; oil spill impacts education programs in Valdez; and tabletop response exercises for Kodiak middle school students.

PWSRCAC continues its youth internship program, with a high school student monitoring for aquatic invasive species in Cordova.

### *PWS Natural History Symposium*

The Council supported the PWS Natural History Symposium to shift to an online venue in May 2020. Twenty-two speakers presented to a virtual audience of 260 participants on a variety of topics related to the region, including a presentation by the Council on our activities. Without Council support, the symposium would have been canceled this year.

## **In Conclusion**

We have kept this application brief in accordance with the streamlined recertification process for this year. This required the omission of many other worthwhile endeavors

by the Council in ongoing efforts to maximize the safety of terminal and tanker operations in Prince William Sound. We would be happy to provide additional details on any of the Council's activities. All reports accepted by the Council's Board of Directors are posted on our website. Enclosed is our 2019-2020 Annual Report which highlights and expands on some of the work mentioned in this letter.

Sincerely,



Donna Schantz  
Executive Director

Enclosure: [PWSRCAC's 2019-2020 Annual Report](#)

Cc: Andres Morales, Alyeska Pipeline Service Co.