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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

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December 13, 2021

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

SUBJECT: Prince William Sound Regional Citizens' Advisory Council
Recertification Application for January - December 2021

Dear Sir/Madam:

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.

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. Substantive changes for 2021 are summarized below.

Broad Representation and Involvement in the Region

Board membership continues to remain strong with all 19 seats filled. Staff were able to work with local leaders to fill the seat for the Kodiak Village Mayors Association in May 2021, noted as vacant in our last recertification letter. New citizen volunteers have been added to our technical committees.

The Council has continued to facilitate meetings and other activities online, given the ongoing COVID-19 pandemic. This includes all three of our Board meetings, which would normally have been held in Anchorage in January, Valdez in May, and Seward in September. Staff continue to look for ways to improve the online experience for our volunteers and the public. Announcements for meetings were provided beforehand.

Partnerships with Stakeholders and Affiliates

Weather Data, Monitoring, and Forecast Models

These projects study wind, water currents, and other environmental factors near the Valdez Marine Terminal (VMT), in Prince William Sound, and in 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 in Prince William Sound and the Gulf of Alaska. Information is collected via the Prince William

Sound Weather Station Network, developed and maintained by the Prince William Sound Science Center, and co-funded by the Council. The Council also maintains two weather buoys in Port Valdez: one near the VMT, the other near the Valdez Duck Flats.

Data gathered is available through the Alaska Ocean Observing System, and the buoy data is also available through the National Oceanic and Atmospheric Administration's PORTS® (Physical Oceanographic Real Time System). The Council has begun work to analyze the data collected from the buoys over the last two years. While it is still too early to confirm weather and current patterns, there is enough data available to start to look for trends. The first in a potential series of yearly reports was completed in September.

Progress Toward More Effective Communications

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

Over this past year, Council staff have 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. An additional meeting was held with Sector Anchorage personnel to discuss several topics pertaining to regional and area oil spill planning issues.

The Council has also been in regular communication with the U.S. Coast Guard after learning the radar system had been inoperable across Prince William Sound due to three-decade-old obsolete equipment. Staff met with representatives from both MSU Valdez and Coast Guard Headquarters to discuss what was needed to get the radars replaced. During the Council's September Board meeting, Commander Drayer provided an update on the situation.

The Council developed a white paper this year to better understand the criticality of having fully functional AIS and radar systems and how they work together to prevent accidents. Key findings from this report are: the radar systems in Prince William Sound are obsolete and should be replaced with best available technology; using state of the art radar technology combined with AIS is a far more complete and robust approach to collision avoidance; and Coast Guard personnel at the Valdez Vessel Traffic Service need the best available tools necessary to ensure the safe navigation of oil tankers serving the VMT.

Coordination with Alaska's Congressional Delegation

The Council communicated with the Delegation on pressing concerns that are directly related to oil spill prevention and response. The Council contacted the Delegation on several occasions regarding the inoperable VHF and radar equipment in Prince William Sound. The Delegation, working directly with the U.S. Coast Guard, was able to secure funding for the

necessary repairs to the VHF radios in Prince William Sound, and the Council continues to work with the Delegation to get the radars replaced.

Strengthening Ties with Citizens' Councils

The Council continues to strengthen our working relationship with Cook Inlet RCAC, including regular meetings between the executive directors and joint letters on issues of importance to the councils. Throughout the pandemic, both councils have endeavored 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 representatives from the Alaska Department of Environmental Conservation (ADEC), as well as from time to time with the 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. This workgroup is tasked with providing an open forum for communicating on the terminal contingency plan with a goal of continuous improvement to the plan and has met since 2003. Over the course of the last year, the Council has attended monthly meetings with representatives from Marathon Petroleum Company, one of the Trans Alaska Pipeline System (TAPS) owner companies, and met on an as-needed basis with the other TAPS shippers, to discuss and work through oil spill prevention and response issues and concerns of mutual importance.

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

Dispersants

This year, the Council updated its list of research articles about chemical dispersants. The 1,770 articles include research from 1981 through 2021. A new supplemental report summarizes research published between 2017 and 2021. This information will help the Council consider future updates to its position on the use of chemical dispersants.

Oil Spill Prevention

Testing Devices Used to Deploy Messenger Lines

Last year, the Council released a report evaluating the technologies available to pass or deploy towing lines to vessels in distress to determine what constitutes best available technology. Little research had previously been done to evaluate the best methods to make this dangerous activity safer and easier. The study recommended a follow-on practical demonstration of the top three to five technologies identified, which was then conducted in

central Puget Sound on June 13, 2021.

The exercise made use of two tugboats and a 285-foot flat-deck barge. Representatives of Restech Norway AS, Datrex, High Seas Trading Company, Samson Rope, and Alyeska were in attendance. Results from the field trials of this equipment, which underscore best techniques in their use and points to improve user experiences, were used to develop recommended practices that are being shared with industry and regulators.

Assessing the Technology for a Rescue Tug Stationed at Hinchinbrook

This year, the Council issued a report that analyzed the best design and equipment for a rescue tug stationed at Hinchinbrook Entrance. This comprehensive report summarizes relevant literature, an analysis of the best design features and equipment needed for this role and environment, and a comparison between that analysis and the tug currently in use.

Monitoring Terminal Operations and Maintenance

Maintenance of Oil Storage Tanks

The Council funded a study of maintenance and inspection records of Tank 8, one of the storage tanks at the VMT, which can hold up to 21,420,000 gallons of crude oil. The analysis showed some corrosion on the tank floor. Alyeska had originally scheduled the floor to be replaced in 2020, but the pandemic delayed the work until 2023. The researchers concluded that the immediate risk of a leak from Tank 8 between now and 2023 is low. However, the study pointed to an apparent error in some of the testing data which may mean that the cathodic protection system is not effectively protecting the tank's floor from corrosion in the long term.

The report also described potential design problems in an underground liner that prevents any leaking oil from entering the surrounding soil. If the liner is leak-proof as designed, rain and snow melt water could collect on top of the liner and possibly damage the tank floors and internal columns. If the liner has been damaged, then oil could escape into the environment in the event of a spill.

Protecting the Terminal's Crude Oil Piping from Corrosion

The Council commissioned a report analyzing the cathodic protection systems used on the crude oil piping at the terminal. The researchers also reviewed Alyeska's methods for monitoring and testing these systems. The report found that overall it appears Alyeska has a "very good" program. However, there were some important issues to be addressed, including that data used to ensure that the system is operating effectively does not appear to have been collected properly and historical data from 2018 suggests that portions of the piping were not adequately protected.

Oil Spill Monitoring

In April 2020, oil spilled from an overflowing sump at the terminal. While most of the spill response was conducted in spring/early summer of 2020, work on the mitigation, cleanup, and monitoring of the impacted areas is still ongoing and tracked by the Council. In addition

to oil spill monitoring, the Council has also been closely monitoring spills of per- and polyfluoroalkyl substances (PFAS) fire-foam from the VMT.

Long-Term Environmental Monitoring

The Council collects environmental samples and has them chemically analyzed for oil contamination related to the operation of the terminal and TAPS tankers every year. As planned, the Council collected samples of blue mussels and marine sediments, and deployed passive sampling devices for analysis. Additional monitoring was conducted in Port Valdez in response to the April 2020 oil spill from the terminal. The Council also conducted and supported monitoring work pertaining to invasives species, forage fish, and marine birds in Prince William Sound.

Preparing to Respond to Oil Spills

Drills and Exercises

PWSRCAC continues to monitor, evaluate, and participate in exercises and training events for the Prince William Sound tankers and the terminal. Due to the ongoing pandemic, exercise and training activities were modified and Council staff and regulators could not observe as normal. This resulted in reduced monitoring with staff participating in six exercises in 2021. The Council did charter its own vessel for two of these events and offered seats to the U.S. Coast Guard and ADEC.

One of the Council's top concerns is whether crews of foreign flagged tankers have any issues with communications and understand the operating environment and systems in our region. The Council has advocated for exercises with foreign flagged tankers and the first one occurred with the Los Angeles Spirit in Prince William Sound this summer. This was one of the exercises that was observed by Council staff via a charter vessel.

State Funding for Oil Spill Prevention and Response

The Council has always been an advocate for adequate state funding for oil spill prevention and response. During the legislative session in 2021, the Council closely followed and provided support for a bill that would secure sustainable funding for ADEC's Division of Spill Prevention and Response. Most of the bill would fund transportation and highway maintenance. However, one of the proposed increases, a half a penny per gallon increase to a refined fuel surcharge, would provide the revenue needed to maintain an adequate prevention program for the state and their ability to respond to major oil spills.

Who Pays for an Oil Spill?

In 2021, the Council worked to better understand who is liable when an oil spill occurs. The answer is not as simple as it may seem, as the legal responsibility for cleaning up a spill and paying for that cleanup can fall to different entities. There are also differing requirements between Alaska laws and federal laws.

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 OSLTF program amendments. The Council's formal recommendations were submitted this year and include establishing a grant program to states and universities for oil spill prevention research and activities, providing for the long-term sustainability of the Fund, and increasing the amount the Coast Guard can draw from the OSLTF for emergency oil spill response without prior authorization from Congress. Senator Dan Sullivan intends to introduce a new bill that incorporates many of these proposed amendments.

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. The contingency plan for tankers in Prince Williams Sound is undergoing its five-year renewal and the Council has been monitoring the process and reviewing available materials. In addition to industry contingency planning, the Council provided comments on the Alaska Regional Contingency Plan, as well as area contingency plans covering Arctic and Western Alaska, and Prince William Sound.

Documenting the History of the Tanker Contingency Plan

The Council finalized a report this year that documented the history of the oil discharge prevention and contingency plan for Prince William Sound oil tankers. The report chronicles how contingency planning issues were identified and addressed during approvals, how contentious issues were resolved, and what issues remain outstanding. It also highlights significant changes and trends over time. The Council believes this information will be helpful for future planners and plan reviewers in understanding past work and the rationale behind certain commitments.

Resources to Support Responders and Communities

Updated Guide: Coping with Technological Disasters

In 2021, an update was completed to the Council's award-winning guide for dealing with an oil spill, "Coping With Technological Disasters - A User-Friendly Guidebook." This guide, first developed after the 1989 Exxon Valdez oil spill, contains science-based strategies to help ease the impacts and disruptions on communities affected by technological disasters like an oil spill.

Resources to Support Regional Stakeholder Committee

The Council created online materials to support a Regional Stakeholder Committee, which is unique to Alaska. During a large spill, the Unified Command may set up this committee and invite groups affected by the incident to participate. Committee members help identify resources that could be useful to the response and have the opportunity to meet with the response decision-makers to discuss local concerns. This resource was developed to help make the process more consistent and productive.

How has Subsistence Harvest Changed Over Time in the Exxon Valdez Oil Spill Region?

Council staff and researchers from the Alaska Department of Fish and Game recently

completed a joint project to assess how the subsistence harvest of natural resources has changed over time in Exxon Valdez oil spill impacted communities. Subsistence harvest data collected from 1984 through 2014, in the communities of Cordova, Chenega, Tatitlek, Port Graham, and Nanwalek, was analyzed. The researchers found that over time fewer households were collecting the majority of subsistence resources in those communities.

Updates to Resources for Teachers and Educators

The Council hosts a set of free educational lessons for K-12 students, the “Alaska Oil Spill Lesson Bank.” The lessons cover a variety of topics related to the mission of the Council. They were first created after the Exxon Valdez oil spill by local educators to meet a need to build a stewardship ethic among our region’s youth. This year, an overhaul and modernization of the lessons was completed. In addition, the Council developed a web tool that allows educators to search the lessons and filter by subjects, grade levels, and educational standards. Outreach to inform educators about this resource is underway.

Sharing Information on our Work

In-person outreach - typically including visits to communities in our region, attending group member functions, giving presentations, coordinating special events, and encouraging citizen involvement in the Council’s work - partially reopened this year. The Council presented its booth as part of the education content at Salmonfest, at the Alaska Association of Harbormasters and Port Administrators conference, and at the Alaska Municipal League annual conference. Virtual events were also sought to share Council information and connect with communities in our region, including presentations at Prince William Sound College and University of Alaska Fairbanks.

Youth Involvement Program

Opportunities for youth supported by the Council included marine summer camps and internships for youth in Kachemak Bay; creation of a Remotely Operated Vehicle (ROV) educators guide for hands-on marine technology activities; oil spill impacts education programs in Valdez; and field excursions into the Sound for youth from Cordova. Staff and volunteers supported integrating oil spill prevention and response science at the Alaska Tsunami Bowl and the Alaska Science and Engineering Fair, both held virtually this year.

PWSRCAC expanded its internship program, with two high school students monitoring for aquatic invasive species in Cordova and one in Valdez. A graduate-level intern supported technology improvements to the Lesson Bank.

Local Educational Conferences

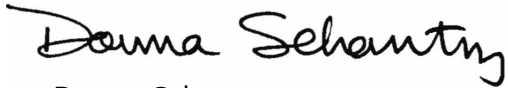
The Council supported two major virtual events in 2021, the third annual PWS Natural History Symposium and the Alaska Forum on the Environment. The Symposium included 20 speakers presenting to a virtual audience of over 260 participants and included a presentation by the Council on our activities. Staff helped organize the oil spill track of the Forum, which this year included a presentation on a Council-sponsored report about assessments of resource harvests in several communities since the Exxon Valdez oil spill.

Staff also compiled and presented on a 25-year history of the Council's aquatic invasive species monitoring program to over 100 participants at the Alaska Invasive Species Partnership annual workshop.

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 2020-2021 annual report ("Year in Review") which highlights and expands on some of the work mentioned in this letter.

Sincerely,



Donna Schantz
Executive Director

Enclosure: [PWSRCAC's 2020-2021 "Year In Review" Annual Report](#)

Cc: Andres Morales, Alyeska Pipeline Service Company
Klint VanWingerden, Alyeska Pipeline Service Company