

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

In Anchorage: 3709 Spenard Road / Suite 100 / Anchorage, Alaska 99503 / (907) 277-7222 / FAX (907) 277-4523
In Valdez: P.O. Box 3089 / 130 South Meals / Suite 202 / Valdez, Alaska 99686 / (907) 834-5000 / FAX (907) 835-5926

MEMBERS

April 21, 2016

Alaska State
Chamber of Commerce

Governor Bill Walker
Office of the Governor
State of Alaska
P.O. Box 11000
Juneau, AK 99811-0001

Chugach Alaska
Corporation

City of Cordova

Subject: Alaska Regional Response Team's March 25, 2016 Proposed Amendment to the Alaska Unified Plan that would eliminate the Regional Stakeholder Committee (RSC) as it is constituted today and replace it with two new committees, reducing public access to information, impeding the transparency of response actions and, in general, weakening rather than strengthening the Plan

City of Homer

City of Kodiak

City of Seldovia

Dear Governor Walker:

City of Seward

This letter is to respectfully request that you and Alaska Department of Environmental Conservation (ADEC) Commissioner, Larry Hartig, direct the withdrawal and revision of the proposed March 25, 2016 amendment to the Alaska Unified Plan for Oil and Hazardous Substance Response.

City of Valdez

City of Whittier

The amendment as presently drafted would eliminate the Regional Stakeholder Committee (RSC) as it has operated successfully over the past decade and substitute in its place two new entities and make other changes that, in our judgment, **weaken rather than strengthen** the Alaska Unified Plan. If implemented, these changes would **undo much of the progress that has been achieved in terms of citizen and stakeholder involvement in oil spills since the Exxon Valdez oil spill.**

Community of
Chenega Bay

Community of
Tatitlek

Cordova District
Fishermen United

The recently proposed amendment is essentially the same that was provided to the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC or Council) in 2013. At that time, the Council sent a letter dated November 5, 2013, to ADEC with a specific critique of the many items in the proposed amendment that were, in the view of the communities and organizations in the PWSRCAC, **a major step backward**. In the three years since then, little has changed in the proposed amendment to improve that assessment from 2013.

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

ADEC, as a member of the Alaska Regional Response Team (ARRT), issued this proposed amendment for public comment on March 25, 2016; public comments are due April 29, 2016. The PWSRCAC has substantial concerns about the content and effect of this amendment, which would substantially reduce the role of RCACs (which as you know Congress authorized as one of the means to help better prevent future major oil spills and to help improve oil spill response) as well as the roles of stakeholder groups, including local and tribal governments.

Oil Spill Region
Environmental
Coalition

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

The proposed changes relate to the mechanism through which stakeholder groups are provided access to the oil spill command structure for much needed two-way

communications during a spill incident. The proposed amendment would eliminate the RSC, a proven and effective mechanism that has been in place for over a decade, and replace it with a much less effective and transparent process for tribal and local governments, Regional Citizens' Advisory Councils (RCACs) and other stakeholders potentially affected by oil spills to serve in constructive roles to help deal with oil spills. **There are no gains in this proposal for the public. . . only losses!**

Under the current plan, the RSC has several opportunities for two-way information exchange during an oil spill. The RSC has access to the Unified Command and Command Post to receive direct updates on what is happening during the response and to provide input on stakeholder priorities. The RSC is also currently provided access to data about how the spill will be cleaned up, including same-day access to a complete copy of the Incident Action Plan (outlining cleanup activities and priorities). The RSC provides an opportunity for people with unique and important local knowledge as well as experts with extensive and critical technical expertise to contribute during an incident. They also serve the critically important role of communicating questions raised by stakeholders during the spill response and providing informed answers back to citizens and organizations most affected and at risk from an oil spill.

The proposed changes would split the RSC into two organizations: a Tribal and Local Government (TLG) Group and an Affected Stakeholders (AS) Group. **Neither group, individually or in combination, would have the same level of access as the present RSC.** In the view of this Citizens' Council, **this is not the direction in which the Alaska Unified Plan should be going.**

Specifically, there are many examples of how the proposed changes would result in **net losses to Alaska's citizens and stakeholders including the following:**

- Regional Citizens' Advisory Councils and other local experts with specific oil spill response expertise would no longer be able to play an active role in representing stakeholders in their area affected by a spill.
- The proposed tribal/local government and stakeholder groups would have **limited access to the Unified Command**, which would make it more difficult, if not impossible, for stakeholders to convey local knowledge, expertise and concerns directly to the Unified Command - the final decision makers - in a timely manner so that the input of the citizens can be incorporated into the response. It also makes it more difficult to collect timely and factual information about the incident to communicate to their constituencies.
- Splitting stakeholders into two groups **reduces the opportunity for collaboration and cooperation.** A combined Regional Stakeholder Committee recognizes that some stakeholders transcend municipal or tribal boundaries; it is arbitrary and counter-productive to try to parse out Alaskan stakeholders into sub-groupings; on the contrary, part of the reason the RSC has worked well is the cohesion of the many stakeholders through participating with the RCACs.

Attached is a summary table that concisely shows how the proposed changes are adverse in many respects to the goal of quickly and effectively responding to an oil spill or similar incident. The PWSRCAC is also informing Alaska's Congressional delegation about its concerns and seeking the delegation's support in (1) communicating these concerns to relevant federal agencies and (2) requesting that the federal Alaska Regional Response Team representatives, EPA and the USCG, work with ADEC, the PWSRCAC and other stakeholders in revising the amendment so that it becomes an improvement to the RSC and the Unified Plan that is likely to bear fruit and protect the Alaskan environment, jobs and people.

As you know so well as someone who was there at the beginning, the Regional Citizens' Advisory Council concept, as conceived of prior to and later incorporated into the Oil Pollution Act of 1990, is to "involve local citizens in the process of preparing, adopting, and revising oil spill contingency plans." The Act states, "only when local citizens are involved in the process will the trust develop that is necessary to change the present system from confrontation to consensus." **We are deeply concerned that the proposed amendment to the Unified Plan will weaken and marginalize citizen involvement in oil spill response and move prevention and response backward** to approaches which contributed to the conditions that led to that very damaging oil spill incident in 1989. Such a move would be untenable and a **breach of faith** with the public.

Alaskans have seen first-hand what can happen when industry, government regulators and the public grow complacent and are not adequately diligent. Diligence requires a great deal of hard work, including the difficult but necessary task of coordination with those who could be harmed or otherwise adversely affected by an oil spill. Over the past 27 years, to your credit and to the credit of all involved, Alaska has developed one of the best and most effective oil spill prevention and response systems in the world. We all need to do what we can to keep it that way and improve on it wherever feasible.

But, as you know from your long work and experience in this noble effort, and as we all have learned from oil spills in other areas of our nation, **one can take nothing for granted and must be vigilant** and aggressive in this work in coordination with industry, local, state and federal government, the public and other stakeholders. We believe that the proposed amendment as it is as of March 25, 2016, while prepared with good intentions, **would represent a step backward for the public, for livelihoods, for people, for fish and wildlife, and for the marine and terrestrial environment.**

Therefore, we strongly **recommend and request:**

(1)that you and Commissioner Hartig direct the withdrawal of the proposed amendment so **that the Regional Stakeholders' Committee as constituted remains as it is today** and has been for more than a decade while generally working well; and

(2)that representatives of the ADEC engage with the PWSRCAC and other stakeholder representatives in the EVOS region, including representatives of local governments, Alaska Native Tribes and Corporations, the fishing industry, tourism, NGOs, et. al. so as to refine and improve as may be reasonable and helpful the coordination between the RSC and the Unified Command while correcting the deficiencies that are in the proposed amendment as it is currently drafted.

Stakeholders of the EVOS region are deeply appreciative of the great work and dedication that members of the ARRT have shown over the years. The Members of the PWSRCAC, including Council member representatives from local governments, Alaska Native Corporations and Tribes, the fishing industry, NGOs, and the State Chamber of Commerce, **all stand ready to engage in the process of helping to improve the proposed amendment.** We feel confident that such an informal process initially can help work out revisions to the amendment for which there would be near-universal support. Once agreement on such revisions can be reached, then the formality of finalizing and approving the amendment would be an appropriate and welcomed next step.

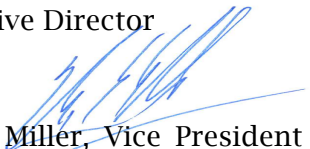
Thank you for your help and your leadership and that of Commissioner Hartig in working with this Council and other stakeholders so that the public will continue to have confidence that

whatever changes are being made are resulting in genuine positive and constructive improvements to the current Regional Stakeholder Committee structure and work, and improvements to the operation of the Unified Command and the Alaska Unified Plan.

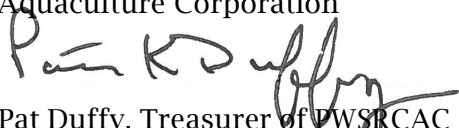
Sincerely,




Donna Schantz
Executive Director



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



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




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



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



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



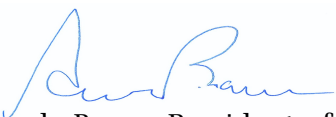
Dorothy Moore, Representative from the City of Valdez



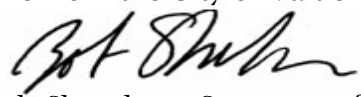
Robert Beedle, Representative from the City of Cordova




Mako Haggerty, Representative from the Kenai Peninsula Borough



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



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



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



Al Burch, PWSRCAC Representative from the Kodiak Island Borough



Michael Bender, PWSRCAC Representative from the City of Whittier



Wayne Donaldson, PWSRCAC Representative from the City of Kodiak



Orson Smith, Representative from the City of Seward



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



Alisha Sughroue, Representative from the City of Seldovia

Cc: ARRT Co-Chairs and Member Agencies

Lary Hartig, Commissioner, Alaska Department of Environmental Conservation

Enclosures: (1) PWSRCAC letter to ADEC official, dated November 5, 2013

(2) Summary table of proposed changes to the RSC prepared by PWSRCAC

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

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MEMBERS November 5, 2013

Alaska State
Chamber of
Commerce

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

Alaska Wilderness
Recreation & Tourism
Association

Chugach Alaska
Corporation

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

City of Cordova

City of Homer

Dear Mr. Gardner:

City of Kodiak

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

City of Seldovia

City of Seward

City of Valdez

City of Whittier

Community of
Chenega Bay

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

Community of
Tatitlek

Cordova District
Fishermen United

Kenai Peninsula
Borough

Kodiak Island
Borough

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

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

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

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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


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

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


Sincerely,



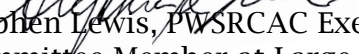
Mark A. Swanson
Executive Director



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




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



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

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




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



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



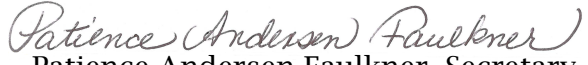
Andrea Korbe, PWSRCAC Representative
from the City of Whittier



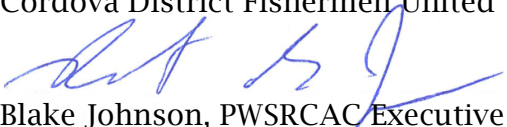
Jane Eisemann, PWSRCAC
Representative from the City of Kodiak



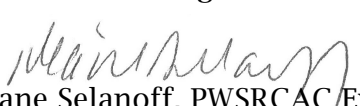
Amanda Bauer, President of PWSRCAC
and Executive Committee Member,
Representative from the City of Valdez




Patience Andersen Faulkner, Secretary
of PWSRCAC and Executive Committee
Member, Representative from the
Cordova District Fishermen United



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



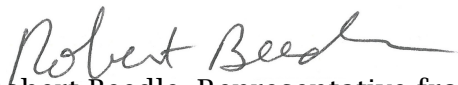
Diane Selanoff, PWSRCAC Executive
Committee Member-at-Large,
Representative from Port Graham
Corporation




Pat Duffy, Representative from the
Alaska State Chamber of Commerce



Dorothy Moore, Representative from the
City of Valdez



Robert Beedle, Representative from the
City of Cordova



Emil Christiansen, PWSRCAC
Representative from the Kodiak Village
Mayors Association

Cc: ARRT Co-Chairs and Member Agencies

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

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

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