

Below is a sample letter which may help your community provide public comment about changes to the Regional Stakeholder Committee process. We recognize that this letter may provide details you do not wish to include or language you may interpret differently. We do not expect your letter to look exactly like this, but feel free to use it as a guide since we have technical specialists who have carefully analyzed this issue before writing this summary. If you need more information on any of the contents before you draft your letter, please let us know.

SAMPLE DRAFT

April __, 2016

Jade Gamble
Alaska Department of Environmental Conservation
43335 Kalifornsky Beach Road, Suite 11,
Soldotna, AK 99669
decsparplanning@alaska.gov

SUBJECT: Update to Annex B of the Alaska Federal/State Preparedness Plan for Response to Oil & Hazardous Substance Discharges/Releases (Unified Plan)

Dear Ms. Gamble:

The City of XXX opposes the “Proposed Process for Community Outreach – Unified Plan Update March 2016” which was posted on the Alaska Department of Environmental Conservation’s public notice website on March 25, 2016. The proposed update to Annex B of the Unified Plan eliminates the Regional Stakeholder Committee (RSC) and proposes to replace it with a much less efficient and less effective process. There are no gains in this proposal, only losses. We request the proposed amendment be withdrawn and the existing Regional Stakeholder Committee process be retained.

The proposal to replace the Regional Stakeholder Committee with stakeholder groups who will have less access to the Unified Command decision making process, less access to information, and reduced access to provide technical, operational and scientific expertise does not improve response effectiveness.

Currently, the Unified Command provides communities with the opportunity to have a seat on the Regional Stakeholder Committee with:

1. **Access to information about how the spill will be cleaned up**, including a complete copy of the Responsible Party’s Incident Action Plan that details response **activities** and all Joint Information Center information that is produced.
2. **Answers to our questions**, addressing questions raised by the Regional Stakeholder Committee;
3. **Access to the Unified Command and Command Post to know what is happening during the response**, including support for the Regional Stakeholder Committee in carrying out their duties and responsibilities as stakeholder representatives.

4. **Collaboration among Stakeholders** where Tribal, local governments and other stakeholders and local experts, including the Regional Citizens' Advisory Council's, have the opportunity to serve on the Regional Stakeholder Committee.
5. **A process for providing input directly to Unified Command**, where communities can provide local knowledge and critical information.

The proposed changes result in:

1. **Decreased expert representation.** Regional Citizens' Advisory Councils and other local experts with specific oil spill response expertise would no longer automatically be able to play an active role alongside local governments in representing stakeholders in their areas affected by a spill. We deserve to have experts with decades of experience representing our interests during a spill response.
2. **Decreased access to the Unified Command.** The Regional Stakeholder Committee would be eliminated and replaced with a Tribal and Local Government Group (TLG) and Affected Stakeholder (AS) Group, and direct access to the Unified Command would no longer be guaranteed. Only the Responsible Party's Liaison Officer is directed to take the leadership role with these two groups, which does not guarantee that community issues will be accurately communicated back to government officials within Unified Command.
3. **Decreased collaboration and cooperation.** A separate Affected Stakeholders Group would be formed to partition and segregate local governments and tribes from all other affected stakeholders, reducing communication and collaboration between those groups. Cooperative and collaborative decision making opportunities that currently occur when stakeholders work as one joint group under a Regional Stakeholder Committee to improve the spill response effort would be greatly diminished or disrupted. We deserve the opportunity to work collaboratively and cooperatively with all affected stakeholders to ensure the spilled materials are efficiently and effectively removed.
4. **Decreased access to information about how the spill will be cleaned up.** Only limited portions of the Incident Action Plan (IAP) may be provided to the Tribal and Local Government Group that the Liaison Officer deems to be "pertinent" for the tribes and local government officials. There is no mention of any portions of the Incident Action Plan being provided to the Affected Stakeholders Group. Yet, the Incident Action Plan is the plan the Responsible Party develops to clean up the spill and provides detail critical to providing meaningful input to the response (some of the critical information contained in the IAP includes a status of the incident, response objectives, work assignments, sensitive areas identified for protection, etc.). All potentially affected stakeholders deserve to know what is planned when a spill occurs in our area.
5. **A less effective communication process to address our concerns.** The amendment proposes that a Liaison Officer (LOFR) would keep the both groups informed, and will as clearly and accurately as possible convey local input and concerns from both groups to the Unified Command. Furthermore, the amendment states that a representative from the Responsible Party (the spiller) will serve as lead LOFR. Removing direct access to the Unified Command and filtering input through a representative of the party responsible for the spill does not improve the current process that allows for direct access to the decision makers during a response. Additionally, eliminating the ability for experts within the proposed Affected Stakeholders Group, such as Regional Citizens' Advisory Councils, from providing expertise on incident priorities, objectives and the Incident Action Plan, or other technical or scientific matters is not an improvement. Communication of complex

technical, operational, and scientific advice would not be effective using this proposed communication system.

Because of the reasons stated above, the City of XXX does not support the proposed amendments to Annex B of the Unified Plan. Rather, we respectfully request that the Regional Stakeholders Committee as currently described in the Unified Plan that has been in place for over a decade, remain in place.

Sincerely,

[Name]

[Title]