Joint study tackling risk factors associated with tankers in Prince William Sound

Shippers, Alyeska, regulatory agencies and RCAC have joined forces to conduct a risk assessment of tankers and their escorts transiting Prince William Sound. The study is expected to take approximately one year. While details are still being worked out, the mission is "to improve the safety of oil transportation in Prince William Sound." The study will examine the risks of shipping casualties and corresponding mitigation measures. Areas to be examined include tanker escorts, human factors, technical and operational aspects of the TAPS-trade tankers, weather and other external environmental variables, and regulatory requirements. Ultimately, the study is expected to identify changes in tanker operations that would yield the most significant safety improvements. The study is jointly sponsored by ARCO Marine, Inc., BP Oil Shipping Co., Chevron Shipping Co., Shell/Beaver Marine, Inc., and Tesoro Alaska, Inc. RCAC is also likely to provide funding.

The project is being conducted by a steering committee composed of representatives from the shippers, the U.S. Coast Guard, the Alaska Department of Environmental Conservation (ADEC), and RCAC. RCAC's representatives are Board President Bill Walker, Michelle Hahn O'Leary and Tex Edwards. Alyeska's Ship Escort Response Vessel System (SERSV) is participating as a non-voting member of the steering committee.

The risk assessment project does not preclude changes in tanker escorts before the project is completed. In a draft finding, ADEC said it would require tankers to be accompanied by enhanced escorts next winter, as an interim measure. State law requires that shippers use the best available technology in oil spill prevention and response equipment. The ADEC said current escort systems fail to meet the "best available technology" standard. "The current tanker escorting system does not employ best available technology especially with respect to the large super tanker vessels of approximately 180,000 DWT and greater," the ADEC said, "...there appears to be reasonable basis to question whether a disabled laden tanker of this size range or larger could be saved in severe weather and sea states in certain locales within the Sound, even if towed and operating at reduced speeds as under the current escort system."

ADEC noted that current escort vessels are not able to assist disabled tankers "are believed to be readily available." ADEC's draft finding is based on the Disabled Tanker Towing Study, which identified limitations based on extreme weather and sea conditions coupled with catastrophic steering and propulsion failures. ADEC's position on tanker escorts was included in its draft findings of the tankers' oil spill contingency plans. The Response Planning Group, which comprises the shippers, is consulting ADEC's draft finding. It argues that the regulation on "best available technology" is inherently flawed, that ADEC cannot apply the "best available technology" standard because the standard has been poorly defined and lacks regulatory guidelines, and that the current escort systems are consistent with the performance capabilities of existing requirements.

RCAC gives mixed review on spill plans

Industry plans for rerouting to oil spilled from TAPS-trade tankers have received mixed reviews from RCAC, which has spent more than a year reviewing the plans. In comments submitted May 19 to the Alaska Department of Environmental Conservation (ADEC), RCAC recommended the oil spill contingency plans receive conditional approval, and outlined areas that it believes need improvement. The issues of highest concern to RCAC are:

- responses to spills in the Gulf of Alaska outside Prince William Sound;
- need for clear delineation of responsibility in the contracts between the shippers and those they hire to respond to a spill on their behalf;
- access and availability of response equipment that must be transported from outside the region ("out of region equipment");
- response to fire and explosion;
- best available technology in spill prevention, spill response and fire fighting; and
- containment of spilled oil before it reaches the shore, known as nearshore response.

ADEC has already indicated it shares some of the same concerns. When ADEC receives changes to the plans in three of those areas — nearshore response, best available technology and out-of-region equipment — RCAC recommended the public be allowed to review and comment on those changes.

Twenty-two oil spill contingency plans for 53 tankers have been under review by the ADEC for nearly a year. Of the 22, called the Core Plan, is the plan for Alyeska's initial
Legislature honors Stephens

In a glowing citation, the Alaska State Legislature has commended Stan Stephens for his contributions to Alaska as president of RCAC.

"Mr. Stephens has devoted thousands of hours and unbounded energy to [RCAC's] mission. He has been an example for all Alaskans of how citizens can constructively influence decisions that affect their lives and communities," the citation says.

Stephens stepped down in March after two years as president. He continues to represent Alaska Wilderness Recreation and Tourism Association on the RCAC board.

"Under Mr. Stephens' leadership the Prince William Sound RCAC has grown and matured into a model of citizen involvement for others to emulate — not just in Alaska, but all over the nation," the citation says.

The citation was presented to Stephens by RCAC President Bill Walker, May 4 in Kodiak.

Volunteer profile: Floyd Heimbuch, chairman extraordinaire

For Floyd Heimbuch, devoting chunks of his time to RCAC comes down to a simple notion of giving something back to society.

"Why do I put in 8 to 10 hours a week? Because it makes me feel like I'm still doing something, that I'm contributing more than I'm taking," he said.

As chairman of RCAC's Oil Spill Prevention and Response (OSPR) Committee, Heimbuch contributes plenty. He has honed into the form of the art of keeping committee meetings focused and on track, and he effectively exerts the views of quieter members. That's no mean feat in a subject area where opinions are strong. Heimbuch is known for his sometimes unusual sense of humor. He, and his 10 brothers and sisters, learned humor as a survival tool while growing up very poor. The family were sharecroppers on a Sioux reservation.

He and his wife Bonnie came to Alaska in 1951 from South Dakota and Nebraska. They taught briefly in Unalakleet before moving to Anchorage. "We loved the village," Heimbuch said. "But dealing with BIA was something else."

"Because I lived on the Sioux reservation as a kid, I had some feel for the cultural differences in Alaska. And some feeling for the externally imposed control that the Native community was subjected to. It's one thing when you choose change, quite another when you haven't asked for it."

An educator for nearly 20 years and a former commercial fisherman, Heimbuch also spent four years as executive director of Cock Inlet Aquaculture, worked as an airplane mechanic, and operated a small tool shop. He and Bonnie moved back to Anchorage from Soldotna a couple of years ago, but both of their four sons still fish in Prince William Sound.

Heimbuch has been a member of the OSPR Committee since 1991 — he learned about RCAC through an ad in the paper — and its chairman since early 1992. In addition to his work on the OSPR Committee, Heimbuch served on the RCAC board as the Kenai Peninsula Borough representative for six months in 1993.

"I think RCAC is trying very hard to represent Aukaska and the shippers as well as regulatory agencies — the realistic opinion of the citizens of the impacted area," he said.

Heimbuch believes RCAC provides what industry seeks and what industry seeks is not necessarily a perfect fit, he said.

RCAC represents people. While most people in industry want us to be objective, what we’re really providing them with is what people are feeling and thinking. That’s not objectivity. They can hire experts for objective views. We provide subjectivity."

The OSPR Committee recently finished months of intensive work reviewing oil spill contingency plans for tanker spills in the TAPS trade. (Story, Page 1). Heimbuch believes the contingency plans provide critical insurance that the industry is prepared to respond in the event of another major spill.

"Contingency plans are the main means we have to help fight complacency. They’re on paper. They’re enforceable. And they’re very detailed. They have to be, because shoppers are not going to do anything that infringes on profits unless they’re required to. Shippers are no different than any other corporation with a profit motive. It’s the nature of our capitalist system. I don’t want anyone responsible for investment of my retirement fund to act any different."

Heimbuch believes formalized citizen involvement through RCAC is the best tool there is to combat a resurgence of the complacency he feared the Exxon Valdez oil spill would encourage. Heimbuch said he'd like to see RCAC's advisory process be as orderly as it can be. He's in no small industry but people accept RCAC's beneficial role and some agencies now understand how helpful we can be. We’re getting there. Slowly, but we’re getting there."
**Oil spill prevention**

Marine transportation through Prince William Sound became safer recently, with the installation of new and upgraded weather reporting equipment. Once minor glitches are worked out - probably by early June - the new equipment will make vessel traffic safer by providing the U.S. Coast Guard with more timely information about conditions in Prince William Sound.

In mid-May, the U.S. Coast Guard cutter Swedebrier placed two new weather buoys, one at Hinchinbrook Entrance near Sea Rocks and one in the center of Prince William Sound. The buoys measure wind speed and direction, barometric pressure, wave height and period, and air and water temperature. New equipment near Bligh Reef measures wind speed and direction, barometric pressure and air temperature. In addition, existing monitoring equipment at Potato Point was upgraded.

Data collected by the monitoring equipment is relayed by satellite to Virginia, where it is verified, monitored and sent back to Valdez and Anchorage by teletype. The buoys sample for eight minutes every half hour and transmit after each sampling. Data arrives in Valdez about 15 minutes after it is collected.

Installation of the new equipment is a sweet conclusion to efforts by RCAC over the last couple of years to fill the gap in weather information. RCAC was joined by industry groups, communities, interest groups and regulatory officials in urging Congressional approval for the funding, which came through a $500,000 appropriation to the National Oceanic and Atmospheric Administration (NOAA).

Before, there were no weather stations between potato Point, in the Valdez Narrows, and Middleton Island, about 100 miles away in the Gulf of Alaska. Weather conditions can vary significantly between Port Valdez and the open waters of the Gulf of Alaska, and those conditions can change quickly. Without equipment to provide real-time or close to real-time weather information, tanker had no way of knowing the conditions between Potato Point and Middleton Island.

**Spill prevention scores big one with new vessel traffic system**

In a major leap forward for oil spill prevention, the U.S. Coast Guard in April officially unveiled its new vessel tracking system for Prince William Sound. The new system, called the automated dependent surveillance system (ADSS), allows Coast Guard watch standers to monitor vessel traffic over a larger area, more efficiently and with more precision than before.

In March, watch standers at the Vessel Traffic Center could not see the Exxon Valdez as it approached Bligh Reef because it was beyond the range visible on the radar screen. If the same error were made today, the watch standers would see it and would have the crew in plenty of time to avoid a grounding.

ADSS is Valdez is the first of its kind. Although it cost approximately $7 million, the system is likely to be installed at other marine terminals in the future. The system has been in place in Valdez since December 1994, but the formal unveiling took place April 11.

The ADSS employs a satellite-based global positioning system to relay vessel positions to the Coast Guard’s Vessel Traffic Center in Valdez, where positions and navigation data are automatically plotted on three large terminal screens. The data originate from tankers and other vessels carrying a transponder/ceiver.

The system features audio and visual cues to alert watch standers to almost any situation out of the ordinary, whether it’s a tanker straying from its track or a vessel dragging its anchor.

The old system relied exclusively on radar and voice reports. The radar coverage extended at most 24 nautical miles out, and usually less. The new ADSS system, vessels are tracked through the entire Sound, east of Hinchinbrook Entrance. That translates to a 12-fold increase in the area “seen,” from 490 square nautical miles to more than 5,000 nautical miles.

Under the old system, each radar screen showed a different section. The three new monitors zoom in and out to show the whole Sound in one picture or zoom in on a small area.

Precision is also significantly improved. The accuracy radar plotting varies, depending on factors such as range from target, size of target and condition of radar, but seldom does it come close to the precision of the new system. The ADSS is accurate to within 10 meters 85 percent of the time. Most of the time, it is accurate within three meters, according to Lt. Joe McGuiness.

Not all vessels traveling in Prince William Sound carry the ADSS equipment. Tankers of 200,000 DWT or more must have the transponder and receiver equipment. State ferries also carry the equipment, and some charter boats are voluntarily participating, as well. The Coast Guard and RCAC have asked cruise ships to consider installing the equipment, too. Cost of the shipboard equipment is now less than $16,000, down significantly from the $30,000 price tag of five years ago.

An extra bonus of the ADSS is that the technology is environmentally friendly. It needs very little electricity to operate and doesn’t depend on the infrastructure of radar. According to McGuiness, a comparable system using only radar would have required 24 generators, 16 diesel tanks, back up power generators and a bunch of fuses to be cut down.
Response and planning

RCAC reviews spill plans

Continued from Page 1

The tanker plans have been under review since March 1994. RCAC's first set of comments was submitted in June 1994. The 21 individual tanker plans are the first generation of plans unveiled under laws passed in the wake of the Exxon Valdez oil spill. Prior to 1989, only one tanker oil spill contingency plan was required for Prince William Sound and it was submitted by Alyeska.

New laws required the shippers to develop individual plans detailing how they would manage a spill response when they take over from Alyeska. The Care Plan covers the initial response to be carried out by Alyeska until the responsible party assures management of the spill response effort. It is the same for all TAPS-train tankers.

In its cover letter to ADEC, RCAC noted that the volume of plans required under the new system makes review more difficult. It must be noted that this process has been made more complicated by the need to review 22 contingency plans, rather than one plan, as would have been the case if Alyeska continued to be the plan holder for all tanker spills in Prince William Sound," the letter said.

ADEC is expected to grant conditional approval of the contingency plans. Conditional approval would require improvements or changes in the plans on a specific schedule. Because the tanker contingency plans deal with coastal areas, the ADEC is following a process dictated by the Alaska Coastal Management Program (ACMP). Under the ACMP process, local districts may appeal ADEC's decision.

Oil spill contingency plans are to be reviewed by the state every three years.

Is the best good enough? Citizens comment on plans

Alyeska's oil spill response system may be the best in the world, but areas outside Prince William Sound are not adequately protected from oil spills because Alyeska's system doesn't extend sufficiently outside the Sound, citizens told a state agency in April.

At public hearings held by the Alaska Department of Environmental Conservation (ADEC), citizens said the biggest flaw in the shippers' contingency plans for responding to an oil spill is their failure to protect important resources outside the Sound.

The hearings were held in Kodiak, Homer, Valdez, Cordova and Anchorage as part of ADEC's review of 22 oil spill contingency plans submitted by shippers. Industry must have approved oil spill contingency plans in order to operate. Alyeska responds on behalf of the oil shippers to suits from tankers within Prince William Sound.

ADEC, RCAC, and the TAPS trade shippers jointly sponsored workshops before the public hearings in each of the communities. About 30 people testified in all.

In general, those who testified said the current prevention and response system would go a long way to preventing and picking up oil spills within Prince William Sound. However, citizens expressed concern about specific areas of the Sound - such as the Copper River Flats, Kodiak Island and lower Kena Peninsula - where Alyeska has not prepositioned any response equipment.

Mary Jacobs, a commercial fisherman from Kodiak, said she's been left with only assurances. "I feel like I just read my grandmother's will and all the cousins, brothers, and sisters got all the permits and boats. I got a skiff and a note saying that the others would take care of me." - Mary Jacobs, Kodiak

Nancy Bird of the Prince William Sound Science Center said that in light of the recent decline in Prince William Sound commercial fisheries, the Copper River Flats is "Cordoro's major fishing gem at this point." RCAC board member Michelle Haney O'Leary, testifying as a Cordoroa commercial fisherman, acknowledged that Alyeska's Ship Escort Response Vessel System (SERVS) is the best in the world. "Why do we want more than the best in the world?" she asked. Because the best, she continued, is not necessarily good enough. All of the communities at stake of a major oil spill - not just those in Prince William Sound - expect a system that prevents oil spills and can respond effectively if spills do occur.

Valdez resident and tourism operator Nancy Lethoos said contingency plans should protect certain recreational areas as well as the other important human use areas already identified in the plans. Citizens who testified also called for use of better available technology in tanker escorts and more information in the plans about firefighting capabilities for a tanker fire.

ADEC was condemned for holding public workshops and hearings in the various communities.

A little bedside reading

Part Saunders, a member of RCAC's contingency plan review team, sits surrounded by some of the oil spill contingency plans and supporting documents reviewed over the past year. Stacked up, the binders here stood more than 10 feet.

Legislative wrap: Not the best of times, nor the worst

The 1995 session of the Alaska Legislature could have been worse and could have been better, in terms of oil spill prevention and response issues. The following is a recap of issues RCAC monitored during the session just ended.

- Marine pilot bill - SB 130 extends the Board of Marine Pilots until 1999 and resolves some financial issues. RCAC testified against two proposals, neither of which appeared in the final bill approved by the legislature. One proposal would have allowed cross-regional licensing. RCAC viewed that as a significant safety issue, as it would have allowed pilots unfamiliar with the area to work in Prince William Sound. The other proposal would have diluted public representation on the board by changing the board composition.

- Spill response equipment - The capital budget includes three pools of money for spill response: $1 million for coastal nearshore response equipment; $500,000 for local hazardous substance release response packages; and $10,000 for response team equipment, maintenance and supplies.

- The million-dollar pot will fund four nearshore response equipment depots and ADEC will decide which communities get them. Kodiak is assumed to be high on the list. In addition to Kodiak, RCAC has recommended response equipment depots in Seward and Homer to respond to spills in the area between Prince William Sound and Cook Inlet. RCAC also recommended additional equipment for the depot in Soldotna. Other communities, among them Dutch Harbor, are expected to vie for the equipment depots.

- Under 1989 legislation, response equipment depots were supposed to be set up statewide. Two demonstration projects were successfully developed last year. The depots consist of state-owned equipment used by trained local volunteers using mainly fishing vessels.

- The capital budget also appropriates $2.7 million for construction of a road from Cordova to Shepard Point and spill response equipment at Shepard Point. The money comes from interest on oil spill settlement accounts.

- Operating budget/ADEC - Spill Prevention and Response (SPAR) was funded at the level requested by the Governor, making it the only division in the Department of Environmental Conservation (ADEC) that was not cut.

- Hazardous Substance Spill Technology Review Council - The council was extended for one more year, barely escaping immediate dissolution. However, the legislature did not approve any additional operating funds. The council was created after the Exxon Valdez oil spill to review and recommend research and development in spill technology.

- Spill technology research - ADEC Commissioner Gene Burden is reviewing the 13 projects recommended by the Hazardous Substance Spill Technology Review Council. Not all of the projects will necessarily go forward, but some contracts were expected to be finalized by the end of May.

Despite fears to the contrary, the legislature did not appropriate remaining funds that had been earmarked for research and development. That leaves open the possibility of funding for two simulators - one for spill response training at Prince William Sound Community College, and the other for bridge training at the Alaska Vocational Technical Center in Seward. RCAC supports the simulators.
Work group looks at consolidating Valdez operations

If the two Valdez Business Units were unified it could lead to a more efficient and effective organization with comprehensive incident response capability, according to the work group examining Alyeska's operations in Valdez.

That is the initial finding of the work group composed of Tim Plummer, Marine Team Leader at the Terminal; Jim McHale, outgoing Manager of SERVS; John Baldridge, GM & S Team Lead; Bob Bandy, Operations Advisor; Jane Thomas and Ron Hamilton, Alyeska Human Resources Generalists in Valdez.

"We placed a high priority on reducing duplication of effort, enhancing communications and improving emergency response coverage on both sides of the bay," said Plummer, the work group leader.

Currently, the terminal and SERVS exist in the corporate structure as separate entities. Terminal employees report to John Dayton, Senior Vice President/Operations and SERVS employees report to Vice President Gary Richardson. The terminal and SERVS each has its own operations, financial, administrative and maintenance teams.

Employee input will be the backbone of the approach proposed by the work group, said Plummer, which has developed a communications plan to ensure employee and other stakeholder concerns are met.

"Employees will tell us how they feel the elements of the operations should be aligned, how we can function as a single organization," Plummer said.

An initial briefing with employees took place May 1 and 2. Meetings are also scheduled with the RCAC, JPO, ADEC, U.S. Coast Guard, Prince William Sound community and Alyeska's Owners and tanker operators.

Plummer said formal recommendations by the work group to the Alyeska Leadership Team are expected by June.

Alyeska sponsored the Fourth International Conference on the Effects of Oil on Wildlife in Seattle, April 12-14. Organized by the International Bird Rescue Research Center, the conference was attended by more than 200 participants from around the world.

SERVS Manager Jim McHale opened the conference and Sharon Hillman, SERVS Senior Compliance Coordinator, facilitated a three-hour panel discussion on Regional Wildlife Response Issues.

"It was a lively discussion on how response is different from the east coast to the west coast and internationally," said Dave Trudgen, Senior Wildlife Coordinator. Trudgen presented one of over 50 technical papers featured at the conference. The paper by Trudgen and Hillman reviewed Alyeska's Oil Spill Response Capabilities for Wildlife Along the Trans Alaska Pipeline and in Prince William Sound.

"We (Alyeska) ahead of almost everyone else in our wildlife response capabilities," Trudgen said. "People were most interested in the lists of our equipment. One man from Hawaii was interested in our design for our mobile response units which, unlike most mobile units, is designed to be towed to locations instead of driven to different locations. He has the same transportation problems that we do; i.e., getting response equipment to remote locations."

"This gave us a unique opportunity," said Hillman, "to look at full-service requirements for wildlife response from the perspectives of the industry and regulatory needs, and the needs of the rehabilators caring for the wildlife."

"I'm always interested in getting an international perspective on oiled wildlife response," added Trudgen. "Often we end up being a resource for other groups because our response capabilities are ahead of theirs."

Proceedings from the conference will be published in June.

Jim McHale, outgoing SERVS Manager, has been picked by Alyeska management to take on a new role. McHale has been charged with closing the company's 1,768 remaining TAPS Audit Items.

McHale moved to Anchorage in May to begin the time-intensive process. "I'm excited about helping the company meet its commitment of closing a majority of the audit items by the end of the year, but I'm sorry to be leaving SERVS and the community of Valdez," McHale said. "Being manager of SERVS has been one of the most rewarding experiences of my life. I have rarely seen such dedication from people and the organization has become a world leader in oil spill prevention and response."

McHale arrived in Valdez as construction manager at the terminal in 1988. In May 1992, he was named SERVS Manager and has overseen the construction of the new SERVS Base/Valdez Emergency Operations Center, implementation of the Oil Pollution Act of 1990 at SERVS, development of the nearshore response force, and the recent U.S. Coast Guard Escort Rule changes for Prince William Sound.

Air and water issues

Did Exxon Valdez oil sink?

Sediment from the floor of Prince William Sound will be sampled this summer to see if oil spilled from the Exxon Valdez sank and accumulated on the seafloor.

The sampling was approved May 5 by the Prince William Sound Regional Citizens' Advisory Council (RCAC) Board of Directors, during its quarterly meeting in Kodiak.

Members of RCAC's Oil Spill Prevention and Response (OSPFR) Committee and Scientific Advisory Committee (SAC) requested the sampling because they suspect that a significant portion of the oil from the Exxon Valdez sank to deep areas of the sound.

Information about the fate and effects of oil spilled from the Exxon Valdez would be useful in the event of any future spills.

RCAC board member Tom Copeland said data gathered on oil spilled from the tanker Braker in January 1993, off the coast of the Shetland Islands, indicate that approximately 30 percent of the oil went to the bottom in a 30-mile radius. Oil carried by the Braker was much lighter than North Slope crude, suggesting that the heavier Exxon Valdez oil would have been even more likely to sink.

Samples will be taken from sites where Exxon Valdez oil is known to have been present, where water is highly mobile and the depth is substantial. RCAC is working with local fishermen to identify the best sites to sample.

The sampling will be conducted in July by Kinetic Laboratories, Inc. Kinetic Laboratories conducts sediment and mussels sampling twice a year under RCAC's long term environmental monitoring program.

Joint study proposed to look at pollution sources in Port Valdez

Scientists sponsored by RCAC and Alyeska plan to join forces soon to begin an ecological risk assessment of Port Valdez.

The study would examine the probability of adverse affects on the marine environment from known and potential sources of pollution.

The risk assessment would be an important step in determining whether effluent from the ballast water treatment facility is causing significant adverse impacts. Pollution caused by the ballast water treatment facility, if any, cannot be determined without considering other sources of pollution in Port Valdez.

The RCAC Board of Directors gave its nod to the new project in May, approving up to $97,000 for it. Alyeska is still considering it.

The full proposal for the risk assessment would be developed by RCAC's research scientists from Western Washington University and Alyeska's research scientists from the University of Alaska Fairbanks. The work would be conducted jointly by Alyeska and RCAC with a third party scientific consultant.
RCAC and Ayleska agree to "no surprises" protocol

RCAC and Ayleska will discuss sensitive issues with each other before making public pronouncements, under a communications protocol now in effect. The protocol was formally approved by RCAC in March and is expected to be signed by Ayleska in June. The protocol resolves a longstanding problem that at times created a serious risk between RCAC and Ayleska. At issue was how and when RCAC publicly criticizes or disagrees with Ayleska. Ayleska argued that it should have the opportunity to resolve differences with RCAC, free of publicity, before the issue of disagreement hits the press. Ayleska felt blindsided by criticism aired publicly before it had the opportunity to explain its position or resolve misunderstandings.

RCAC sympathized in concept but insisted that any solution had to honor RCAC's open-meetings policy.

Under the protocol, RCAC and Ayleska will make public pronouncements on sensitive issues until efforts have been made to reach consensus. The protocol lays out a process for building consensus, but it does not assume or require that consensus be attained on every issue. If consensus cannot be reached on a particular issue, public pronouncements may be made to the media one day after the process to reach consensus has ended.

Ayleska will receive 10 days' advance notice of agenda items for RCAC board meetings and three days' notice for RCAC Executive Committee meetings. RCAC will "seriously consider" Ayleska's input on sensitive issues.

The protocol reinstates RCAC's freedom to lobby Congress, the Alaska Legislature and administrative officials on any issue within its scope. The original 1990 contract between RCAC and Ayleska allowed lobbying, but an addendum negotiated in 1993 removed the right to lobby.

The question of how and when RCAC publicly criticizes or disagrees with Ayleska had been a sore point since 1992, when a scientific consultant for RCAC released conclusions about the fate and effects of airborne hydrocarbons emitted at the Valdez Marine Terminal. The findings were not shared with Ayleska prior to release at a public forum in Valdez.

The protocol talks began in January 1994 and concluded in February 1995, with version #14. Attorneys were excluded until the last few rounds of negotiation.

Comments due on RCAC certification

Comments from the general public on RCAC's recertification as the federally-required advisory group for Prince William Sound will be accepted until June 26.

Comments should be sent to: Executive Secretary, Marine Safety Council (E-LIA-3400) (CDU 16-000), U.S. Coast Guard Headquarters, 2100 2nd Street SW, Washington, D.C. 20393-0001.

The Oil Pollution Act of 1990 (OPA 90) established two pilot projects for citizen advisory groups for oil terminals in Prince William Sound and Cook Inlet. The law allows an existing organization to be the advisory group so long as it satisfies certain criteria. Both the Prince William Sound and Cook Inlet RCACs are certified as alternative voluntary advisory groups.

The U.S. Coast Guard is charged with assessing whether the RCAC follows the general goals and purposes of OPA 90 and is broadly representative of the communities and interests as envisioned under OPA 90. The RCAC was originally certified in 1991 and has been recertified annually since then.

Copies of RCAC's application are available at the RCAC, 750 W. 2nd Ave, Suite 100, Anchorage, AK 99501-2168.