



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

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MEMBERS

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Alaska State
Chamber of Commerce

April 10, 2015

Chugach Alaska
Corporation

Admiral Dan Abel
Seventeenth Coast Guard District
PO Box 25517
Juneau, AK 99802-5517

City of Cordova

City of Homer

SUBJECT: Support for Retaining USCG Spill Response Equipment Caches in the Exxon Valdez Oil Spill Region

City of Kodiak

City of Seldovia

Dear Admiral Abel:

City of Seward

As you are aware, the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation whose mission is to promote environmentally safe operation of the Valdez Marine Terminal and associated tankers. Our work is guided by the Oil Pollution Act of 1990, and our contract with Alyeska Pipeline Service Company. PWSRCAC's 18 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as commercial fishing, aquaculture, Native, recreation, tourism and environmental groups.

City of Valdez

City of Whittier

Community of
Chenega Bay

Community of
Tatitlek

Cordova District
Fishermen United

On behalf of the PWSRCAC member organizations and volunteers, we strongly support maintaining the U.S. Coast Guard spill response equipment caches located throughout the Exxon Valdez oil spill region. In many cases, these equipment caches are the first and only line of defense to respond to and protect sensitive areas during the early hours of an oil spill.

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

While many of the U.S. Coast Guard equipment caches are co-located with State of Alaska and/or various Oil Spill Response Organization (OSRO) equipment, the justification that the U.S. Coast Guard caches are not necessary because this other equipment is available is not entirely accurate. OSRO equipment is specifically designated for spills emanating from the company that contracts with that OSRO and is therefore not available for other spills in an emergency. For instance, Alyeska's Ship Escort/Response Vessel System (SERVS) caches of equipment located throughout Prince William Sound are specifically reserved for any spills from the Valdez Marine Terminal and the associated crude oil tankers. Because most, if not all, of the OSRO-cached equipment is listed in contingency plans to meet federal and state requirements, requests for use of this equipment for unrelated spills may result in non-compliance situations for the planholder, and in most cases these requests will be denied.

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The Coast Guard caches help local communities throughout Alaska mount early responses to pollution incidents in order to minimize environmental damage that may occur. The remote communities in Prince William Sound and on Kodiak Island rely on these caches for critical initial responses where OSRO equipment may be stockpiled but not available to municipalities or villages. Because of the remote nature of many of these sites, it could be days before out-of-region equipment is brought in to respond to a spill. Additionally, in the event of a large spill such as the Exxon Valdez, all available U.S. Coast Guard equipment in the region will most likely be utilized to get ahead of the leading edge of the spill and protect sensitive areas. Therefore, the caches in these remote areas are perhaps more critical than caches in more populated areas in the lower 48 states.

The PWSRCAC requests the U.S. Coast Guard retain these important equipment caches throughout the Exxon Valdez oil spill (EVOS) region. The communities within the EVOS region with U.S. Coast Guard oil spill response equipment caches include: Whittier, Chenega, Cordova, Valdez, Port Graham, Seward, Kodiak, Homer and Kenai. Please feel free to contact me at 907-834-5060 if you have any questions or would like to discuss this request further. Thank you, in advance, for your favorable consideration of this request.

Sincerely,



Mark A. Swanson
Executive Director

cc: CAPT Paul Mehler, USCG Sector Anchorage
CDR Joseph Lally, USCG MSU Valdez
LT James Nunez, USCG D17
Barry Roberts, Alyeska Pipeline Service Company