



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

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January 28, 2002

MEMBERS

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Alaska Wilderness
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City of Kodiak

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Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

Prince William Sound
Aquaculture
Corporation

Rear Admiral T.J. Barrett
Commander
Seventeenth Coast Guard District (M)
709 West 9th Street
Juneau, AK 99801

SUBJECT: Recertification Application

Dear Sir:

The Prince William Sound Regional Citizens' Advisory Council (RCAC) 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.

As was the case last year, this application is being prepared under the guidelines contained in the Coast Guard's Dec. 21, 2000, Federal Register notice of proposed revisions to the recertification process. (We understand, however, that our application will be put out for public comment in accordance with the Coast Guard's original recertification procedures.)

Under the new guidelines, the lengthy narrative of past recertification applications is to be replaced in this application by a summary of substantial changes to the information provided at the last recertification.

Most of RCAC's major program and project activities are summarized in our 2000-2001 Annual Report, enclosed herewith. The following information highlights significant changes, developments and projects since our last recertification application was submitted.

Oil Spill Prevention

Double-Hull Tankers

As noted in our annual report, July 11, 2001, marked a great day for the council and for all Alaskans: the arrival in Valdez of Phillips Petroleum's *Polar Endeavour*, the first OPA 90 double-hull tanker built specifically for the North Slope trade. Many of the council's founders were double-hull advocates even before March 1989, and council members and staffers lobbied hard in the months after the *Exxon Valdez* spill to make sure double-hull requirements were included in OPA 90.

Ice Detection Project

Icebergs calving from Columbia Glacier and drifting into the Prince William Sound tanker lanes have long been recognized as a major navigational risk. RCAC continues to coordinate efforts to address and mitigate that risk through the Ice Detection Radar Project. This project moved forward rapidly in the past year, through a partnership with the Alaska Department of Environmental Conservation, U.S. Coast Guard, Oil Spill Recovery Institute, Alyeska/SERVS, NOAA, and the Prince William Sound Community College.

The radar tower has been installed on Reef Island and early this spring work will resume with the installation and operation of the conventional radar and the beginning of research and development.

Oil Spill Response

Geographic Response Strategies

RCAC promotes region-wide oil-spill response capability by funding and participating in work groups that develop Geographic Response Strategies as a primary mechanism for the protection of sensitive areas and resources. This past fall, RCAC led work group efforts to gather public input for sites where Geographic Response Strategies should be developed. Our outreach efforts included radio ads in Prince William Sound, as well as comprehensive information on our web site.

Trans-Alaska Pipeline System Contingency Plan Review (Partial)

This year RCAC reviewed and commented on the oil spill contingency plan for southern portions of the trans-Alaska pipeline where a spill could be carried into Prince William Sound or the Gulf of Alaska via the Copper and Lowe River drainages. Because our contract prevents us from spending Alyeska funds to review contingency plans for areas outside Prince William Sound, we secured grant funds from third parties for this project.

Environmental Protection

Non-indigenous species research

For several years, RCAC has been exploring ways to assess and reduce the risk of invasion of Alaska waters by non-indigenous aquatic species arriving in tanker ballast water. Over the past year, RCAC has participated with BP Shipping and other organizations in an experiment to evaluate whether ozone can be used to kill aquatic organisms in ballast water. Preliminary results, presented to the council board, ex-officios and stakeholders in December 2001, suggest that ozone can, in fact, be an effective tool in controlling non-indigenous species. Though there is some variability among different species, ozone produced mortality rates exceeding 95 percent for zooplankton and bacteria. Also important is the finding that the residual toxicity of ozonated ballast water is low.

Valdez Marine Terminal

Marine Terminal Fire Safety

RCAC coordinated an October 2001 joint fire exercise at the Valdez Marine Terminal. This exercise was unique in that it was the first time the Valdez City Fire Department and Alyeska's Fire Brigade for the Valdez Marine Terminal had worked together to plan and execute an exercise at the terminal using each other's personnel and equipment. Earlier in 2001, RCAC's consultants helped test an improved fire foam system at Alyeska's East Metering Facility and also to identify problems with fire brigade personnel turnover and with maintenance of fire protection systems. These cooperative efforts were so successful that Alyeska has requested continuing activities by RCAC's consultants and has provided additional funding for this work.

Right of Way Renewals

Over the past year, RCAC continued its participation in the right-of-way renewal process for the terminal facilities of the Trans-Alaska Pipeline System. The existing 30-year permits expire in 2004, and renewal is a unique and crucial opportunity to shape the operation of the system for the next 30 years. At the invitation of JPO and Argonne National Laboratory, RCAC provided comprehensive comments regarding the scope of the environmental impact statement. As the process continues, RCAC expects to review the environmental impact statement for the right-of-way and again offer appropriate comments. RCAC will also comment on draft leases and grants expected to be made public during the second half of 2002.

Community Impacts

Peer Listener Training

Our council, with funding support from the Oil Spill Recovery Institute and the Cook Inlet Regional Citizens' Advisory Council, produced a training video based on the Peer Listener Training program. The program, one of the components of our "Coping with Technological Disasters Guidebook," trains local residents to provide help to disaster-impacted communities, specifically communities impacted by technological or man-made disasters such as oil spills. The lay person learns to be a peer support counselor, advisor, friend, and referral agent for fellow community members.

This month, we premiered the video in Cordova with a full training presentation to residents. The video will be presented in Kodiak in April, and in other interested RCAC communities throughout the year. The video has been distributed widely in the RCAC region.

Organizational Excellence

Long-Range Plan

In December 2001, the council board approved a Five-Year Strategic Plan. This plan, under development for more than a year, will guide the council's operations for the next five years, subject to annual updates to accommodate changing circumstances and issues. A copy is enclosed.

Web site

In Fall 2001, council staff began a major upgrade to the RCAC web site (www.pwsrcac.org). The site is being completely redesigned to make access to information easier, and new information is being added, such as a calendar of council-related events and meetings. A marketing plan is being written, and the council is considering making some of its videos available on the site.

Responses to Coast Guard recertification recommendations and audit recommendations

In its September 19, 2001, recertification notice in the Federal Register, the Coast Guard took note of a recommendation by the RCAC's audit firm that RCAC minimize the practice of employees charging personal travel expenses to RCAC when combining official and personal travel and later reimbursing RCAC for the personal portion. In January 2001 Deputy Director for Administration Marilyn Leland issued a directive to staff to discontinue this practice. In salient part, the directive stated: "If you are traveling on RCAC business or accessing any other direct bill accounts, you cannot charge personal expenses."

In its September 7, 2001, recertification letter, the Coast Guard recommended that RCAC respond to negative comments about RCAC submitted by the Cordova-based Native Village of Eyak (NVE) in connection with our 2001 recertification. NVE felt it was not represented by RCAC in matters pertaining to the safety of marine transportation of North Slope Crude oil.

The council contacted NVE, asked if the organization was interested in seeking a board seat on RCAC, and invited an NVE representative to speak at our September 2001 quarterly board meeting in Cordova. Robert Henrichs attended and spoke on behalf of NVE, but did not indicate any desire for the creation of an NVE board seat on RCAC. We have received no communication from NVE since the September meeting indicating an interest in a board seat.

Also in its recertification letter, the Coast Guard recommended certain administrative policy changes regarding travel. Two new travel policies were adopted at our September meeting, as follows:

Travel Policy 701 (Approved 9/28/01)

Travel Expense Reimbursement Options: Board, Committee and staff members will be reimbursed for the lodging and meals portion of travel based on Federal per diem guidelines. Travel of less than a full day will be reimbursed at 25% of full per diem if no overnight stay is required, and at 75% of full per diem if an overnight stay is required. If the Federal per diem rate is not sufficient to cover the cost of lodging, the additional cost will only be reimbursed if the amount has been approved in advance by the Executive Committee for travel by members of the Board, Committees and the Executive Director, or by the Executive Director for travel by staff. Receipts must be submitted for costs exceeding the Federal per diem guidelines. The per diem rate cannot be exceeded for meals. Travel advances based on federal per diem guidelines must be requested at least two weeks in advance; however, receipts must be submitted after travel is complete to determine the traveler's reimbursement balance.

Travel Policy 709 Approved 9/28/01

Alcoholic Beverages: No employee or volunteer will be reimbursed for alcoholic beverages purchased for any reason.

In addition, the board formed a travel policy committee to evaluate the need for further travel policy changes.

The Coast Guard's recertification letter also recommended we address additional policy issues raised in the Coast Guard audit of RCAC during the summer and fall of 2001. On Jan. 8, 2002, RCAC sent the Coast Guard a letter summarizing the changes already made in response to some of these recommendations, and the process under way to evaluate the need for additional changes. Rather than repeat that material here, we are enclosing a copy of our Jan. 8 letter for reference.

Additional documents submitted

The Coast Guard's Dec. 21, 2000, Federal Register notice calls for the submittal of various supporting documents with the application. We are enclosing the required documents, as well as some others we believe would assist in the evaluation of our work and in collecting comments on this application. Including documents referenced earlier in this letter, we are submitting:

- Our most recent annual report
- Our most recent audit report and annual financial statement

- Our budget and spending plan for the current year, Fiscal Year 2002
- Our Five-Year Strategic Plan. (The Federal Register notice calls for submittal of our budget for next year, but it is still in preparation. The Strategic Plan, however, addresses FY 2003 operations in general terms.)
- Observer newsletters published during and since Fiscal Year 2001
- Our Jan. 8 letter to the Coast Guard regarding issues raised in the Coast Guard audit
- This year's Alyeska audit of RCAC
- Our response to the Alyeska audit
- Newspaper advertisement to be published by RCAC advising residents of our region of the opportunity to comment on our application. This will appear when the Federal Register notice of our application is published.
- Press release to be distributed to news organizations in RCAC region advising of opportunity to comment on our application. This will also appear when the Federal Register notice of our application is published.

If you need additional information please contact me or Stan Jones in our Anchorage office.

Sincerely,



John S. Devens, Ph.D.
Executive Director

cc: Richard Ranger, Liaison
Alyeska Pipeline Service Co.