

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

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MEMBERS

January 14, 2010

Alaska State
Chamber of
Commerce

Commander, 17th Coast Guard District (M)
PO Box 25517
Juneau, AK 99802

Alaska Wilderness
Recreation & Tourism
Association

SUBJECT: Recertification Application

Chugach Alaska
Corporation

Dear Sir:

City of Cordova

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) 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, or OPA90.

City of Homer

City of Kodiak

City of Seldovia

This application is submitted under the guidelines in the U.S. Coast Guard's Sept. 16, 2002, Federal Register notice, which established a streamlined recertification process for two years out of every three. The notice stated that a streamlined application need only "describe any substantive changes to the information provided at the last triennial recertification." The year covered by this application falls under the guidelines for the streamlined process. Substantive changes are summarized below.

City of Seward

City of Valdez

City of Whittier

Twentieth Anniversary of the Exxon Valdez Oil Spill

Community of
Chenega Bay

This recertification year included the 20th anniversary of the Exxon Valdez oil spill of 1989. The council decided early on to use the anniversary, which fell on March 24, as a vehicle for refreshing organizational and public awareness of the impacts of the spill and the lessons it provided on safe crude oil transportation through Prince William Sound. In connection with this effort, the council organized or participated in a number of events and activities:

Community of
Tatitlek

Cordova District
Fishermen United

- As a top priority, we launched a project aimed at preserving the present practice of dual tug escorts for all laden oil tankers operating in Prince William Sound. After this effort began in January 2009, both chambers of the Alaska Legislature passed unanimous resolutions in favor of the escort system; Alaska's governor wrote a strong letter in support of the system; and Senators Lisa Murkowski and Mark Begich introduced legislation in the U.S. Senate to preserve the system. Most recently, the U.S. House incorporated a provision to preserve the escort system when it passed the Coast Guard Authorization Act in October 2009.

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

- The council authored [The Spill: Personal Stories from the Exxon Valdez Disaster](#), a 288-page oral history of the spill of 1989. It includes interviews with Coast Guard officials, other regulatory personnel, oil-industry personnel, and citizens of the region affected by the spill. It was published on the 20th anniversary of the spill and received uniformly favorable reviews.

Prince William Sound
Aquaculture
Corporation

- The council produced a video, Then & Now: The Alaska Oil Spill at 20, as well as a written report, Then and Now: Changes in Prince William Sound Crude Oil Transportation Since the Exxon Valdez Oil Spill, to educate the public about the spill and about improvements to the oil transportation system in Prince William Sound since 1989. Both are distributed free to interested parties.
- The council authored several op-ed pieces and other media releases that ran in the Observer (our quarterly newsletter) as well as in various Alaska newspapers.
- On and around March 24, the council organized or participated in numerous events, including a council-organized day-long program of panel discussions and other anniversary-related events in five communities linked together by videoconferencing.
- “Spill”, a traveling art show co-sponsored by the council, was exhibited in Homer, Kodiak, and other communities, starting in March 2009 and running through the summer of the year.
- By invitation, the council participated and presented remarks at a March 13 reception at the Russell Senate Office Building in Washington, D.C., organized by the National Oceanic and Atmospheric Administration to mark the anniversary.

Toward more effective communications

In last year’s recertification letter, RADM A.E. Brooks urged that the council improve the effectiveness of its communication style with Coast Guard, industry, and agency personnel in order to foster productive long-term partnerships.

In response, our acting executive director has met with various Coast Guard personnel and has been attending the monthly breakfast meetings of the commander of MSU Valdez. In addition, the executive director has worked to encourage continued Coast Guard participation in meetings of the council’s Port Operations and Vessel Traffic Systems Committee, and in company with board member Walter Parker she attended the change-of-command ceremony in Juneau when RADM Brooks was replaced by RADM Colvin.

With regard to the council’s relationships with other regulators and industry, we have initiated regular meetings with the Alaska Department of Environmental Conservation and have continued our years-long practice of monthly meetings with personnel from Alyeska’s Ship Escort/Response Vessel System. The council has also continued the quarterly Valdez Marine Terminal Coordination work group meetings attended by the Joint Pipeline Office (Alaska Department of Environmental Conservation, Bureau of Land Management, Environmental Protection Agency), the Coast Guard, Alyeska, and the council. We consider the cooperation that takes place between these entities one of the most successful processes in which the council participates. The work group has tackled issues such as training, storage tank status and inspections, facility status, and drill and exercise design.

Internal operations

During our efforts to secure legislation to preserve the dual-escort requirement for laden tankers in Prince William Sound, we occasionally found it necessary to conduct strategic deliberations in closed sessions. At first we did this by having private meetings of our Legislative Affairs Committee (LAC). As this committee had met publicly in the past, these private meetings became of concern both to people inside our organization and to some of our stakeholders outside it who had participated in LAC meetings in the past. Accordingly, we formed an in-house project team to deal with the very limited number of elements of our legislative efforts that need to be

discussed in confidential proceedings. The project team meets in private, then forwards its recommendations to the Legislative Affairs Committee for consideration in open session.

Combating invasive species

For well over a decade, the risk that Prince William Sound could be invaded by non-indigenous species arriving in tanker ballast water has been a major concern for the council, and we have supported research efforts and other measures to address this threat. This past year, we backed House Bill 12, proposed state legislation that would create the Alaska Council on Invasive Species to serve as a statewide clearinghouse and coordinating body on the issue. The bill did not pass in 2009 but will remain before the Alaska Legislature in 2010, and the council continues to support it. In addition, we have supported federal legislation and regulation to require ballast water exchange and other management techniques by oil tankers as part of the effort to prevent invasions by non-indigenous species.

Monitoring for barrier jet winds

In the summer of 2009, the council partnered with the Coast Guard, the Prince William Sound Science Center, and the Cape Saint Elias Lightkeepers Association to install a new state-of-the-art weather monitoring station on Kayak Island, in the Gulf of Alaska southeast of Prince William Sound. One of the motivations for the council's purchase of the station, which grew out of a suggestion from NOAA, was the need to monitor for conditions that could produce a weather phenomenon called "barrier jets," very high winds created when a low pressure storm system approaches a range of mountains such as those along the Gulf of Alaska coast. The result can be ocean waves large enough to endanger passing tankers. In 2007, the tanker Seabulk Pride left Prince William Sound laden with oil and, near Seal Rocks a few miles outside the Sound, encountered 35-foot waves and winds gusting up to 132 mph. The vessel was damaged when a large wave broke over the bow. For the council, the installation of this weather station demonstrates how multiple groups can collaborate to make a difficult project become reality in promoting safer crude oil transportation in our region.

Spilled oil recovery rate analysis

After the state of Alaska approved Alyeska's plans to adopt the Current Buster booming system, the council became concerned about whether the new system was truly equivalent to the older systems it replaced. The council hired an expert to analyze spilled oil recovery rates, resulting in the very welcome finding that the Current Buster is from two to four times as effective as previous systems, depending on the nature of the spill. However, the study also raised concerns about whether the Alaska state planning standard of cleaning up 300,000 barrels of oil in 72 hours can be met in the field even under the best of conditions. The study found that, even in the best case—a spill producing a continuous, steady release over an extended period of time—the system could recover only about 247,000 barrels. With an instantaneous release of 300,000 barrels, the study found, the response system might collect as little as 1,000 barrels in 72 hours. In coming years, the council will be seeking ways to improve oil recovery capability in the Sound.

Oil spill simulants

In an effort to improve oil spill response training, the council has launched a two-phase oil simulation material project. The effectiveness of oil spill response

deployments can be greatly enhanced by having a target that behaves similarly to oil on water during exercises. The first phase, completed last year, was a study to determine what oil simulation materials have been used in the past, their advantages and disadvantages, and the permit process for getting approval to use them in Alaska. The second phase will be to form a workgroup with agencies and industry to select potential materials to use and get the appropriate permits to test and train with the selected materials.

Executive director search

Following the resignation of longtime council Executive Director John Devens in May 2009, our board launched a search for a new executive director. As this application was being submitted, the board had made a tentative selection and was still in the process of attempting to reach a mutually agreeable employment agreement with the successful applicant. Accordingly, we are not in a position to report closure on this issue, but plan to do so in next year's recertification application.

Iceberg detection radar system

In September August 2009, the council's SeaScan iceberg radar processing system on Reef Island stopped providing data to SERVS and the Coast Guard because of difficulties in reintegrating the processor after an upgrade to the Coast Guard Terma radar antenna system on the island. The council has long regarded the iceberg radar as an important element of the safety system in Prince William Sound and, as of this writing, is working with Alyeska, the Coast Guard, and radar manufacturers to find a way to reintegrate the SeaScan processor back into the overall system. With ice flow from Columbia Glacier forecast to continue over the next two decades, posing severe risks to transiting Prince William Sound tanker traffic, our council believes the ice detection radar system should continue to serve as an invaluable part of the U.S. Coast Guard's Vessel Traffic System for the foreseeable future.

Fishing vessel readiness

The council launched a project during the winter of 2008-2009 to verify the readiness of Alyeska fishing vessel fleet. This is a time of year when fishing captains may be outside of Alaska or their boats may be out of the water or otherwise not ready to respond.

A council contractor conducted the survey by telephoning vessel captains, followed by in-person surveys of the six ports with vessels in the program.

While most Tier 1 vessels—those required by contract to respond the fastest—appeared to be ready to respond on short notice, the telephone survey showed that just under half of the Tier II captains surveyed were ready to respond within the 24-hour window specified in their contracts. The council is still considering how readiness of the Tier II fleet could be improved.

Improving Prince William Sound oil tanker contingency planning

As part of the renewal of the 2007 Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, the council agreed to participate in a steering committee with an objective of continuous improvement of the plan. The steering committee, comprised of one member each from industry, regulators, and the council, directs working groups formed to address outstanding issues from the plan renewal. In turn, these working groups may develop recommendations for changes to the currently-approved contingency plan.

The first working group to form under the steering committee was the Personnel Work Group. As required in a condition of approval of the 2007 tanker contingency plan, the work group was formed in 2008 to identify the minimum number of field responders needed to carry out the plan's worst-case scenario. The work group met over a period of several months, and developed recommendations for amendments to the tanker contingency plan.

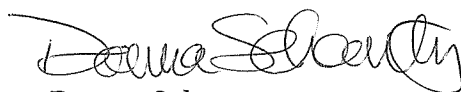
In 2009, two additional work groups were formed - the ANS (Alaska North Slope) Crude Properties Work Group and the Crucial Skimmer Testing Work Group. As oil properties have changed over the last 20 years, the ANS Crude Properties Work Group is expected to determine current ANS crude properties that impact oil spill response. The Crucial Skimmer Testing Work Group is tasked with developing additional testing on high capacity oleophilic skimmers. The shippers in Prince William Sound began testing skimmers in 2008 in an effort to find a high capacity oleophilic skimmer, and additional testing is expected in March 2010. USCG representatives are included on the working groups.

Pathfinder grounding

In keeping with its responsibilities under OPA90, the council has been involved in the operational and response issues arising from the Dec. 23, 2009, grounding of the tug *Pathfinder* on Bligh Reef. Inasmuch as this incident was still under review and investigation by multiple entities at the time of submission of this recertification application, we have not attempted to review it in detail here. Rather, it is our intention to cover the Pathfinder grounding in full in next year's comprehensive recertification application.

We have kept this application brief in accordance with this year's streamlined recertification process. This required the omission of many other worthwhile endeavors by our council in our ongoing efforts to reduce the risk of another catastrophic oil spill in Prince William Sound, so we stand ready to furnish information on those as needed. Also, we would be happy to provide additional detail on any of the undertakings described above.

Sincerely,



Donna Schantz
Acting Executive Director

cc: Barry Roberts, Liaison, Alyeska Pipeline Service Co.