



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

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MEMBERS

November 22, 2019

Alaska State
Chamber of Commerce

Commander, 17th Coast Guard District (dpi)
PO Box 25517
Juneau AK 99802
Attn: LT Ian McPhillips

Chugach Alaska
Corporation

City of Cordova

Dear Sir:

City of Homer

Please find enclosed the Prince William Sound Regional Citizens' Advisory Council's application for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

City of Kodiak

City of Seldovia

City of Seward

In accordance with procedures developed during the 2014 comprehensive recertification, this application is based on a questionnaire developed by the U.S. Coast Guard for the recertification process. The current package includes the following:

City of Valdez

City of Whittier

- Completed questionnaire using the form provided by U.S. Coast Guard
- Annual report of the Prince William Sound Regional Citizens' Advisory Council
- Draft news release on the availability of our application for review and comment
- Additional materials: the Council's budget and five-year Long-Range Plan; most recent financial audit; and funding contract and most recent contract addendum with Alyeska Pipeline Service Co.

Community of
Chenega

Community of
Tatitlek

Cordova District
Fishermen United

Kenai Peninsula
Borough

As discussed previously with the U.S. Coast Guard, we have again attempted to make this application both smaller and easier to review, such as referring the reviewer to our annual report where it covers additional information. If you need anything further, please contact Brooke Taylor in our Anchorage office or me in our Valdez office.

Kodiak Island
Borough

Kodiak Village Mayors
Association

Sincerely,

Donna Schantz
Executive Director

Oil Spill Region
Environmental
Coalition

Port Graham
Corporation

cc: Andres Morales, Alyeska Pipeline Service Co.
PWSRCAC Board of Directors

Prince William Sound
Aquaculture
Corporation

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Prince William Sound
Regional Citizens' Advisory Council

2019 Recertification Evaluation
OPA 90, Section 5002 (d)

1. **Membership.** The advisory group should be broadly representative of the interests of the communities in the geographical area.

a. Membership policies, including the selection and appointment process for the advisory group, and any of its Committees, to ensure full public participation.

Membership in the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC or Council) is governed by its bylaws. Member organizations are communities affected by the Exxon Valdez oil spill and interest groups with a stake in the region. Member organizations appoint individuals to represent them on the PWSRCAC Board of Directors and serve at the pleasure of the organization.

The bylaws require each representative be a resident of the State of Alaska. Directors serve staggered two-year terms. There is no limit to how many terms a Director may serve. When a Director's term expires, the member organization submits in writing the name of the person it wishes to be seated as its representative on the Board. Directors are formally seated by a vote of the Directors at the annual meeting in May. When a Director leaves in mid-term, the member organization may appoint a replacement to fill the unexpired term, subject to formal seating by the Board of Directors.

The following organizations hold ex-officio seats as non-voting members of the Board of Directors:

- Alaska Department of Environmental Conservation (ADEC)
- Alaska Department of Fish and Game, Habitat Division (ADFG)
- Alaska Department of Natural Resources (ADNR)
- Alaska Division of Homeland Security and Emergency Management
- Bureau of Land Management (BLM)
- National Oceanic and Atmospheric Administration (NOAA)
- Oil Spill Recovery Institute (OSRI)
- U.S. Coast Guard, Marine Safety Office Valdez (USCG)
- U.S. Department of the Interior (DOI)
- U.S. Environmental Protection Agency (EPA)
- U.S. Forest Service (USFS)

PWSRCAC's work is assisted by five volunteer technical committees that operate with financial and staff support from PWSRCAC. Membership on these advisory committees is open to any member of the public, including PWSRCAC Board members, subject to appointment by the PWSRCAC Board.

The committees are:

- Oil Spill Prevention and Response Committee (OSPR)
- Scientific Advisory Committee (SAC)
- Terminal Operations and Environmental Monitoring Committee (TOEM)
- Port Operations and Vessel Traffic Systems Committee (POVTS)
- Information and Education Committee (IEC)

Members of the PWSRCAC Board and committees are listed in the PWSRCAC annual report (“Prince William Sound Regional Citizens' Advisory Council 2018-2019 Year in Review,” pages 23-26) enclosed with this application.

PWSRCAC works to ensure that representative communities and interest groups are well informed about our work. Towards this end, PWSRCAC has delivered community outreach presentations, public receptions, youth education, workshops, or meetings in the following communities in the Exxon Valdez oil spill region: Akhiok, Cordova, Chenega, Homer, Karluk, Kenai, Kodiak, Larsen Bay, Old Harbor, Ouzinkie, Port Lions, Port Graham, Seldovia, Seward, Tatitlek, Valdez, and Whittier (see pages 19-22 of the annual report).

b. Opportunities provided for interested groups to participate. Membership should represent but not be limited to:

- (i) Local commercial fishing industry organizations whose members depend on the fisheries resource of the waters in the vicinity of the terminal facilities;
 Yes No Describe: Cordova District Fishermen United
- (ii) Aquaculture associations in the vicinity of the terminal facilities;
 Yes No Describe: Prince William Sound Aquaculture Corporation
- (iii) Alaska Native Corporations and other Alaska Native organizations whose members reside in the vicinity of the terminal facilities;
 Yes No Describe: Chugach Alaska Corporation; Chenega Corporation and Chenega IRA Council; the predominantly Native communities of Chenega and Tatitlek; six villages on Kodiak Island that are represented by the Kodiak Village Mayors' Association; and Port Graham Corporation.
- (iv) Environmental organizations whose members reside in or use the vicinity of the terminal facilities;
 Yes No Describe: The Oil Spill Region Environmental Coalition, consisting of the following members: Alaska Center for the Environment; Alaska Forum for Environmental Responsibility; Alaska Marine Conservation Council; Cook Inletkeeper; Copper River Watershed Project; Kachemak Bay Conservation Society; Kodiak Audubon Society; Prince William Soundkeeper.
- (v) Recreational organizations whose members reside in or use the vicinity of the terminal facilities;
 Yes No Describe: Since the 2014 Recertification, our former recreation organization, Alaska Wilderness Recreation and Tourism Association, closed its doors. While we don't have an organization currently filling a recreation seat, we are meeting this objective with recreation interests represented through the Municipalities participating on our Board, as well as individual Board members that bring strong recreation focus through their professions.

- (vi) The Alaska State Chamber of Commerce or other organization, representing the locally based tourist industry;
 Yes No Describe: Alaska State Chamber of Commerce
- (vii) Other.
 Yes No Describe: Kenai Peninsula Borough; Kodiak Island Borough; cities of Cordova, Valdez, Whittier, Seward, Homer, Seldovia, and Kodiak

c. The extent to which meetings are publicized in the media and are accessible to members of the general public. Describe:

PWSRCAC Board meetings are open to the public and include an agenda item for public comment. Board meetings are publicized via news releases, advertisements in newspapers within the Exxon Valdez oil spill region, emails to various lists maintained by PWSRCAC, and by the posting of agendas and supporting materials to our website, www.pwsrcac.org. Meetings of PWSRCAC technical advisory committees are also open to the public. They are publicized by email and by the posting of agendas and supporting materials to committee websites maintained by PWSRCAC.

2. Establishing communications with industry and government. The Coast Guard will consider the means by, and the extent to which, the advisory group maintains open communications with industry and government interests (oil terminal, oil tanker, and state and federal government representatives). In assessing the group’s ability to communicate with these interests, the Coast Guard’s review will include but not be limited to the following:

a. A determination as to whether the group works with industry and government to establish and employ communications protocols for reviewing policies, projects, and release of information relating to the operation and maintenance of the oil terminal facilities and crude oil tankers which affect or may affect the environment in the vicinity of their respective terminals.

Yes No Describe:

We strive for maximum interaction and cooperation with the industry companies and the regulatory agencies involved with marine transportation of Alaska North Slope crude oil. This is in keeping with our mandate under the Oil Pollution Act of 1990 (OPA 90) to reduce complacency by promoting partnerships in the common effort to minimize the risk of crude oil spills, improve the capability for responding to spills, and minimize the environmental impacts of routine operations. We participate with industry and regulators in numerous work groups and task forces, encourage industry and government representatives to attend and participate in our Board and committee meetings, and routinely solicit their comments and input.

As noted, PWSRCAC’s Board provides ex-officio seats for various government agencies, including the USCG, EPA, ADEC, BLM, NOAA, and more. PWSRCAC also communicates with government agencies through a number of formal and semi-formal meetings. Many state and local government staff, as well as Alyeska Pipeline Service Company (Alyeska) employees attend PWSRCAC’s tri-annual Board meetings. Staff from the USCG, BLM, and ADEC, Prince William Sound (PWS) Shippers, as well as Alyeska, regularly attend meetings of PWSRCAC’s technical committees to discuss

terminal and tanker related policies, projects, operational and maintenance information. PWSRCAC staff strives to attend stakeholder breakfasts hosted by USCG Marine Safety Unit (MSU) Valdez, where representatives from both state and federal agencies, as well as industry representatives including Alyeska, are in attendance.

Staff attends periodic meetings with the ADEC and continues to meet monthly with Alyeska's Ship Escort/Response Vessel System (SERVS) personnel to discuss operations, contingency planning issues, and projects of mutual interest.

Top executives of PWSRCAC and Alyeska meet bi-weekly to discuss relations between the two organizations, and the staffs interact regularly. Working with the designated Alyeska liaison, PWSRCAC requests, receives, and discusses Valdez Marine Terminal (VMT) operations and maintenance information. Through this line of communication with Alyeska, PWSRCAC remains apprised of both routine and emergent operational and maintenance issues, as well as terminal project related information.

PWSRCAC staff interacts regularly with officials of the shipping companies operating oil tankers out of Valdez, and executives of these companies frequently visit PWSRCAC's Valdez and Anchorage offices on an informal basis. Also, shipper executives regularly accept invitations to address PWSRCAC at Board meetings.

PWSRCAC continues to attend and participate in quarterly VMT Coordination workgroup meetings attended by the BLM, EPA, ADEC, USCG, Alyeska, and SERVS. The purpose of this group is to provide an open forum for communication on contingency planning. The goal is to achieve a continuous improvement process to maximize contingency plan effectiveness.

PWSRCAC sponsors, as well as participates in a host of industry and/or government-sponsored, group events, as described elsewhere in this application. The more formal groups include:

- Alaska Forum on the Environment's Oil Spill Sessions Planning Committee, including EPA, DOI, and ADEC
- Alaska Regional Response Team (ARRT) and related working groups, an advisory board to the Federal On-Scene Coordinator led by the USCG, ADEC, and EPA
- Arctic and Western Alaska Area Committee including administration, external communications, exercise and training, and geographic response strategies (GRS) subcommittees. Members include USCG, ADEC, EPA, NOAA, Bureau of Safety and Environmental Enforcement (BSEE), Alaska Department of Fish and Game (ADFG), DOI, and Cook Inlet Regional Citizens Advisory Council (CIRCAC)
- Prince William Sound Area Committee including the administration subcommittee. Members include USCG, ADEC, ADFG, and OSRI
- Marine Firefighting Symposium including Southwest Alaska Pilots Association, USCG, Alaska Division of Emergency Services, Crowley Maritime, and many other organizations
- OSRI Board of Directors

- Pacific States / British Columbia Oil Spill Task Force, including ADEC, USCG, NOAA, CIRCAC, and many other state, provincial, U.S. federal, Canadian federal, Native and First Nation tribal governments, industry representatives, and NGOs
- Valdez Marine Safety Committee, chaired by the USCG
- VMT C-Plan Coordination Working Group, chaired by Alyeska, including USCG, ADEC, and BLM

These frequent, multi-level contacts between PWSRCAC and industry and regulators mean that each side is made aware of each other's perspectives on a variety of issues. We expect these contacts to continue and it appears the industry also finds them valuable.

PWSRCAC employs contractors in Juneau, Alaska, and Washington, D.C., to monitor legislative and administrative developments at the state and federal levels in areas of Council concern. These contractors advise PWSRCAC on how to respond and on occasion provide oral or written testimony on behalf of PWSRCAC.

In conjunction with our legislative monitors, PWSRCAC has continued to support the creation of an Alaska non-indigenous species coordinator group from existing state personnel. At the federal level, the Council has worked with the Alaska Congressional Delegation to insert language into the Vessel Incidental Discharge Act that removes the exemption from USCG ballast water regulations for oil tankers serving Valdez and travelling between Valdez and other U.S. West Coast ports. Other work with the Alaska Congressional Delegation has included draft legislation that reauthorizes the financing rate for the Oil Spill Liability Trust Fund. The proposed legislation contains provisions that ensure the long-term sustainability of the Fund and expands its utility to include research grants and prevention programs.

Informing and advising both the Alaska State Legislature and the Alaska Congressional Delegation has become more urgent in the last three years, in particular regarding potential impacts of continued regulation rollbacks and agency budget cuts on oil spill prevention and response. PWSRCAC recognizes the importance of strong regulations and adequate government funding and oversight in order to prevent spills, and make sure there is an adequate response system in place should prevention measures fail. The Council wants to ensure that regulators and industry are kept from the complacency that Congress determined was a major contributing factor in the 1989 Exxon Valdez oil spill.

In summary, PWSRCAC continues to pursue and, we believe, maintain the type of relationship with industry and government envisioned in OPA 90.

b. A determination as to whether the group participates in discussions with industry and government, concerning permits, plans, and site-specific regulations governing the activities and actions of the terminal facilities which affect or may affect the environment in the vicinity of the terminal facilities and of crude oil tankers calling at those facilities.

Yes No Describe:

PWSRCAC tracks and reviews state and federal site-specific regulations. This is done by monitoring updates proposed, under review, and made in the Federal Register and Alaska regulations. As a part of this process, PWSRCAC periodically discusses the applicability, interpretation, and enforcement of these regulations with industry and regulatory agencies through individual meetings, committee meetings, and through regulatory processes such as informal reviews.

In the past three years, PWSRCAC has worked with Alyeska and the ADEC Divisions of Air Quality and Water Quality to obtain, review, and understand information pertaining to the VMT's air and water quality permits. Discussions with Alyeska and ADEC on both of these permits resulted in the Council submitting written comments to ADEC.

PWSRCAC has also been providing public outreach in multiple Exxon Valdez oil spill region communities on several issues, such as changes to U.S. ballast water regulations affecting Alaska's coastal tanker trade; suggested changes to the Regional Stakeholder Committee process; adoption of the new Area Plan structure; and the transition to Edison Chouest Offshore (ECO) as Alyeska/SERVS new marine services contractor.

In 2017, PWSRCAC, along with the City of Valdez, Prince William Sound Aquaculture Corporation, and Valdez Fisheries Development Association, filed a request for an administrative appeal with the Alaska Department of Environmental Conservation over protection of environmentally sensitive areas in Alyeska's VMT contingency plan. The sensitive areas are the Solomon Gulch Hatchery and Valdez Duck Flats. In early 2019, a settlement agreement was reached that included, but was not limited to, all parties agreeing to work collaboratively on a solution. After a series of collaborative workgroup meetings, consensus was reached and Alyeska agreed to file an amendment to the VMT contingency plan to address specific concerns raised in the original request.

c. A determination regarding the extent to which the advisory group is working to build cooperation rather than confrontation with industry and government by:

- (i) Working with industry and government to develop spill prevention and contingency plans;
 Yes No Describe:

PWSRCAC currently continues its long participation in the development of both the terminal and tanker contingency plans. This work is performed with regulatory and industry stakeholders through regular meetings of the VMT Coordination Group and internally through PWSRCAC's Contingency Plan Project Team. Since 2017, PWSRCAC has provided extensive comments on: renewal of the contingency plans covering the VMT and the PWS tankers; marine transition amendments covering the terminal and tankers; the Arctic and Western Alaska contingency plan; Alaska area planning structure on spill prevention and response; State of Alaska regulatory changes, including public scoping on petroleum cleanup levels; dispersant use avoidance areas to the ARRT; and USCG and EPA federal on regulatory reform agenda. (More information on pages 9-10, 14 of annual report.)

In 2018, PWSRCAC contractor Nuka Research and Planning developed a paper entitled “Alaska’s Oil Spill Response Planning Standard – History and Legislative Intent.” This paper summarizes historical information about the development, passage, and implementation of Alaska’s response planning standard. (More information on page 12 of annual report.)

PWSRCAC continues to partner with Alyeska/SERVS staff to share the fishing vessel program’s annual oil spill training with local citizens, an annual program that started in 2016. PWSRCAC charters a passenger vessel in one community each year to take local youth and residents to learn about SERVS’ oil spill training for local fishermen and mariners.

PWSRCAC staff also participate in the Arctic and Western Alaska Area Committee and the Prince William Sound Area Committee to establish stronger outreach and community engagement plans.

PWSRCAC continued its Community Spill Response Workshops in the region. These day-long workshops, supported by USCG, ADEC and SERVS, address how a large spill would be managed, Incident Command System basics, how information flows into and out of the command post, and how a community would interact with decision makers. The goal is to enhance the public’s understanding of the processes involved during an oil spill and their ability to constructively engage during a spill.

- (ii) Coordinating study projects, policies and legislative or regulatory recommendations; and
 Yes No Describe:

PWSRCAC's practices with respect to scientific study projects are discussed in detail in "3. Scientific work." More generally, PWSRCAC fosters coordination and awareness of our projects, policies, and legislative or policy recommendations through the public nature of our Board and committee meetings; numerous workgroups and panels in which we participate; publication of our annual report and Observer newsletter; the vast amounts of material available on our website; production of news releases and op-ed articles; and public availability of our formal comments and advice on legislative and regulatory issues.

In 2017, comments were submitted nominating Dispersant Use Avoidance Areas in our region of operation, namely PWS, Cook Inlet, and Kodiak. These comments focused on the oceanography in the region, including discussion on the significance of seamounts, continental slope areas, troughs, canyons, and banks. In response, the ARRT designated areas where dispersants are to be avoided and included these sites in area plans.

To align with the National Contingency Plan and National Response Framework, changes were proposed in Alaska to the federal and state area plans. In 2018, PWSRCAC participated in the review process for these changes, and provided

comments on the consolidation of subareas and changes in oil spill preparedness. In 2019, PWSRCAC commented on planning changes to one of the newly-formed areas in Alaska encompassing the coast from the Aleutian Islands to the North Slope – the Arctic and Western Alaska Area Plan.

ADEC conducted public reviews of proposed regulatory changes to oil spill regulations in 2017, 2018, and 2019. A public scoping was conducted on changes to petroleum cleanup levels and PWSRCAC made recommendations in 2017. Administrative changes were proposed in 2018 dealing with details on tanks and best available technology about which PWSRCAC made comments. In 2019, a public scoping process by ADEC to review contingency planning regulations and statutes began, as well as a public review process by the Regulatory Commission of Alaska for comments on the joint application by Harvest Alaska, a wholly-owned subsidiary of Hilcorp Alaska, LLC, and BP Pipelines (Alaska) to transfer assets to Harvest Alaska. The Council is actively monitoring these developments and working to provide comments.

Shortly after the change in the federal administration in 2017, both the EPA and the USCG solicited comments through the Federal Register on evaluating regulations and guidance documents in response to Executive Orders issued by President Trump. PWSRCAC recommended to both the USCG and EPA to not repeal, replace, or modify any current regulations without rigorous scientific, technical, and economic review of each proposed rule.

In 2018-2019, PWSRCAC worked with regional partners to deploy new weather buoys at two locations in Port Valdez: the Alyeska VMT and the Valdez Duck Flats. Partners included Alyeska, the Prince William Sound Science Center (PWSSC), the City of Valdez, Prince William Sound Aquaculture Corporation, and Valdez Fisheries Development Association. Fairweather Science, a subsidiary of ECO, donated the buoys to the Council for use in this project. These buoys will improve understanding of weather conditions in Port Valdez that could affect marine vessel safety and movement of spilled oil, as well as help with decisions regarding the timing of protecting environmentally sensitive sites in the area. The installation has been permitted by several agencies and facilitated by the USCG in granting the Council access into the marine security zone that borders the terminal. (More information on page 10 of the annual report.)

- (iii) Keeping industry and government interests informed of its plans, findings, and recommendations.

Yes No Describe:

The processes described in 2.c.(ii) above also serve the purpose of keeping industry and government interests informed of our plans, findings, and recommendations. We regard the workgroups in which we participate and the meetings of our technical advisory committees as particularly effective tools for this purpose.

During its January 2019 Board Meeting in Anchorage, the Council presented its findings related to the condition of the secondary containment liners at the VMT, both Alyeska and government representatives were in attendance. Earlier in January 2019, the Council submitted similar secondary containment liner findings and recommendations to the ADEC Division of Spill Prevention and Response as part of its written comments pertaining to the renewal of the VMT's Oil Spill Contingency Plan. Following the January Board meeting, in March 2019 the Council sent Alyeska a letter including its detailed findings report as well as a formal recommendation for Alyeska to consider regarding the secondary containment liner. (More information on page 8 of annual report.)

3. Scientific work. The Coast Guard will review the extent to which the advisory group coordinates its independent scientific work with the scientific work performed by or on behalf of the terminal operators and operators of the crude oil tankers in an effort to avoid unnecessary duplication, and to ensure that research and studies are relevant to issues that impact the environment in the vicinity of the terminal facilities and of crude oil tankers calling at those facilities. Describe/Examples:

PWSRCAC has established policies and practices to ensure its independent scientific work addresses environmental issues related to the VMT and associated tankers. Further, PWSRCAC's work is coordinated with scientific work done by others for terminal and tanker operators in order to avoid unnecessary duplication.

A majority of the Council's scientific work is conducted and coordinated through the operation of its Scientific Advisory and Terminal Operations and Environmental Monitoring Committees. The committees review proposed research projects and provide assistance and advice to other PWSRCAC committees, the PWSRCAC staff, and the Board of Directors on scientific methodology, data interpretation, and other subjects. To keep current on the information available and to avoid duplicative work, committee members, associated staff, and contractors review reports about Alyeska-sponsored science. For example, from 2017-2019, the Council's staff and contractor reviewed the Alyeska-funded report titled "Environmental Studies in Port Valdez, Alaska."

PWSRCAC routinely sends copies of Board and committee agendas and background packets to Alyeska, regulators, and oil shippers to keep them informed about proposed and ongoing scientific work. The packets include status updates and draft reports for review and comment. PWSRCAC Board and committee meetings, as mentioned above, are open to the public, providing regular opportunities for interested parties to monitor and comment on research projects.

To coordinate its independent science and ensure the work remains relevant to the operation of the terminal and tankers, the Council committees follow a well-developed and documented process to plan and execute scientific projects. For example, in June 2019, SAC began a new type of environmental monitoring related to how oil pollution may affect gene expression in blue mussels. Planning for that mussel genetics project began in fall 2018 and was conducted during public meetings to which Alyeska, along with state and federal agencies, were invited and often attended. The mussel genetics

project, like all Council projects, was scrutinized to ensure it aligned with the Council mandates in OPA 90 and its Alyeska contract. During the initial execution of the project in June 2019, this work was further coordinated with Alyeska and the USCG while mussel samples were collected along the shoreline of Port Valdez.

PWSRCAC staff, committee, and Board members attend major conferences to maintain contact with experts in environmental science and oil spill prevention and response, and to keep informed about current research.

The Cordova-based OSRI has been an ex-officio member of PWSRCAC since 1997. OSRI is associated with the PWSSC, providing another avenue for coordination and expert oversight of PWSRCAC's scientific work.

All of these efforts at inclusion and coordination are reflected in the descriptions of our activities in specific topic areas in our annual report and elsewhere in this application. In addition, we are enclosing, as Attachment 1 to this questionnaire, a list of reports produced by PWSRCAC and its contractors in this recertification period, as well a list of the scientific and technical experts we have consulted.

4. Monitoring program. The Coast Guard will review the extent to which the advisory group develops and carries out an effective monitoring program, including:

a. Reviewing the operation and maintenance of terminals and tankers;

Describe/Examples:

Through the TOEM Committee, PWSRCAC reviews the operation and maintenance of the VMT in the interest of mitigating its environmental impacts. Through this committee, PWSRCAC monitors a variety of operations-related metrics (e.g., spill reports, water and air quality data) and reviews Alyeska reports (e.g., their annual facility integrity report) concerning terminal maintenance and environmental impacts. Additionally, the committee monitors and reviews Alyeska projects pertaining to work maintaining, repairing, or replacing VMT assets used to prevent or mitigate the effects of an oil spill. During their public meetings, the TOEM Committee and Alyeska discuss terminal-related operational and maintenance issues. As needed, the TOEM Committee initiates projects with recognized expert contractors to further review and analyze specific terminal operations and maintenance practices. For example, in 2018 and 2019 the Committee conducted a project analyzing how Alyeska currently maintains its secondary containment liners and if other types of liner testing methods could be used to improve upon current maintenance practices. (More information on page 8 of the annual report.)

b. Monitoring cleanup drills and actual spill cleanups;

Describe/Examples:

PWSRCAC devotes considerable effort to monitoring drills, exercises, and training events, as well as to responses to actual incidents, which fortunately are relatively rare in PWS. These efforts are described in some detail on pages 13-14 of the annual report. Staff often participates as a member of drill planning teams along with ADEC, USCG,

and industry. Drill monitoring reports are prepared by staff and contractors and submitted to the Oil Spill Prevention and Response Committee for acceptance. An annual Drill Monitoring report is submitted to the PWSRCAC Board for approval before general release (see Attachment 1, Scientific Work).

In addition, PWSRCAC holds regular meetings with personnel from Alyeska/SERVS and reviews SERVS operations. PWSRCAC and SERVS representatives meet on a monthly basis in an effort to increase communications by providing a venue to share information, pose questions, and provide or request status reports. Regular topics of discussion include SERVS' operations, maintenance and exercise schedules, and PWSRCAC's schedule of events and meetings. Other agenda topics include on-going or upcoming PWSRCAC projects involving SERVS' operations.

PWSRCAC also conducts regular communications meetings between staff and ADEC representatives. The goal is to hold these meetings on a monthly basis. Topics of discussion include the review of schedules for projects, meetings, contingency plan deliverables, and various events such as drills and exercises. Other agenda topics include discussion of current issues and projects. These meetings have been effective in improving communication between the Council and ADEC.

PWSRCAC representatives also strive to attend monthly stakeholder breakfast meetings sponsored by USCG MSU Valdez. These informal gatherings are intended to provide a forum for those interested and involved in the safety and security of marine transportation in PWS to stay connected. These meetings help to establish positive relationships with each other prior to major events happening.

PWSRCAC staff and volunteers regularly participate in annual drills conducted by the Trans Alaska Pipeline System (TAPS) shipping companies, such as the 2019 BP/Alaska Tanker Company tanker oil spill exercise, which involved a 180,000-barrel crude oil spill to PWS. During this exercise, PWSRCAC staff and volunteers integrated into and evaluated the Incident Command System organization as well as the Regional Stakeholder Committee that was initiated and tested during the exercise. Additionally, PWSRCAC staff participated in multiple planned VMT tabletop, equipment deployment, and sensitive area protection oil spill exercises as well as unannounced exercises. During all of these exercises, PWSRCAC personnel worked closely with federal, state, and local agencies, as well as tribal, industry, and stakeholder representatives to establish relationships to enhance oil spill prevention and response.

Staff spent considerable time at the ECO headquarters in Louisiana monitoring ECO mariner training in conjunction with the Alyeska/SERVS transfer to ECO of their marine services contract in 2017 and 2018. This first-hand look at the ECO training facility helped staff understand the vast ECO training resources and corporate culture, and also helped build rapport with future PWS mariners. This training program was a large investment for ECO, but the return on that investment is that mariners arrived in PWS with an understanding of the equipment they would be operating, and a broader understanding of the prevention and response systems and procedures that are unique to PWS. (More information on page 5 of the annual report.)

c. Reviewing the results of oil spills in its region;
Describe/Examples:

When a TAPS-related spill occurs, PWSRCAC is active in observing Incident Management Team operations as well as field cleanup activities. The Council also provides input and advice to industry and regulators regarding specific response operations. Two significant oil spills occurred from the VMT in the past three years, one in September 2017 and another in February 2018. After each of those spills, Council staff, Board members, and volunteers worked with Alyeska staff to understand why these spills occurred, and how Alyeska would prevent similar incidents in the future. In addition to verbal communications, after each spill Alyeska wrote investigation reports that were provided to and reviewed by the Council.

In addition to those two significant spills, the Council also regularly reviews the results of relatively minor oil spills that occur due to the operation and maintenance of the Valdez terminal and tankers. Whenever a spill occurs, Alyeska notifies the Council as well as state and federal regulators. These notifications are saved by the Council, reviewed in a cursory manner daily, and reviewed in depth at least annually during the January PWSRCAC Board of Directors meeting. If a particular spill is significant (e.g., oil hits the water or a particularly large volume is spilled to land or secondary containment), Council staff works with Alyeska to learn more about the cause of the spill, the response, and what Alyeska is doing to prevent similar incidents in the future. Information about these relatively minor spills is shared with Council management and often during public meetings of the TOEM Committee.

d. Reviewing government and company reports;
Describe/Examples:

PWSRCAC routinely reviews and analyzes industry and government reports relevant to operations in PWS, often utilizing the services of contractors with technical expertise in the subjects covered by these reports. In the past three years, PWSRCAC has provided input on public reviews of State of Alaska regulatory updates, including proposed changes to Chapter 18, Title 75 of the Alaska Administrative Code and changes to federal and state area planning. On a federal level, comments have been submitted on identification of areas where dispersants should be avoided, and advice by PWSRCAC on not repealing regulations which serve to protect human health and the environment.

In 2018, the decision was made in Alaska to align with the National Contingency Plan and change from the Unified Plan and ten Subarea Plans to a Regional Contingency Plan (RCP) and four Area Contingency Plans (ACP). In 2018, PWSRCAC submitted comments on the RCP as well as the PWS and Arctic and Western Alaska ACPs. Additionally, PWSRCAC worked directly with Senator Dan Sullivan and his staff on S. 865 Spill Prevention and Response Surety Act to reauthorize and make improvements to the Oil Spill Liability Trust Fund. Information regarding our work on this bill was shared

with USCG Headquarters, Alyeska, and the Alaska Delegation during our annual legislative visit to Washington, DC.

In 2019, Payne Environmental reviewed an Alyeska report pertaining to the results of their 2018 Environmental Monitoring Program. Report reviews are also conducted by Council staff and technical committee volunteers. Other examples include the TOEM Committee review of ADEC's Prevention & Response Division FY 2017 Annual Report in January of 2019 and Council staff completing a comprehensive review of Alyeska's 2013-2017 discharge monitoring reports in September 2018.

Council staff also review industry reports on a daily basis. Every morning PWSRCAC staff receive and review two reports from Alyeska, one regarding the tanker shipping schedule and the other regarding the availability of spill response vessels and equipment in PWS. These daily reports are used by the Council to monitor the operations of the VMT and associated tankers, and monitor spill response readiness in the region.

e. Conducting or reviewing necessary scientific studies with or by recognized experts in the field under study.

Describe/Examples:

This aspect of PWSRCAC activities is discussed in detail under "3. Scientific Work," above. The Council conducts or funds many scientific studies needed to understand the actual and potential environmental impacts of the VMT and associated tankers, and these studies are either conducted directly by or advised by recognized experts in the field under study. For example, the Council funds a study monitoring oil contamination in Port Valdez and PWS called the Long-Term Environmental Monitoring Project, initiated in 1993. Currently, that project is conducted annually by two recognized experts in the field of environmental forensic chemistry. Results are summarized in a year-end report (page 17 of the annual report). In another example, Council staff, volunteers, and interns annually conduct a study to monitor PWS for marine invasive species that could be introduced from oil tankers. While that study is mostly conducted by citizen scientists, part of the work is conducted by the Smithsonian Environmental Research Center, which also serves in an advisory capacity. This organization is comprised of multiple experts in the field of marine invasive species, notably Dr. Gregory Ruiz who edited the book titled "Invasive Species: Vectors and Management Strategies" (page 18 of the annual report).

The Council also reviews many scientific studies conducted by external entities that are relevant to understanding the potential environmental impacts of the VMT and associated tankers. Such science reviews are conducted using two methods: (1) the Council pays recognized experts to conduct scientific literature reviews, and (2) the Council sends its volunteers (some of whom are recognized experts) and staff to scientific conferences. In 2018 and 2019, the Council contracted with Dr. Merv Fingas to conduct a literature review of scientific studies about chemical dispersants. Dr. Fingas is a recognized expert in the field of chemical dispersants and oil spill response in general.

The Council annually sends its staff and volunteers to multiple scientific conferences including but not limited to Arctic and Marine Oil Spill Program (AMOP, 2017-2019), the Society of Environmental Toxicology and Chemistry Annual Meeting (SETAC, 2019), and the International Conference on Aquatic Invasive Species (ICAIS, 2019) to learn more from recognized experts about a variety of topics related to the actual and potential environmental impacts of oil transportation.

5. Efforts to prevent oil spills and to plan for responding to, containing, cleaning up, and mitigating impacts of oil spills. The Coast Guard will review the extent to which the advisory group:

a. Periodically reviews the respective oil spill prevention and contingency plans for terminal facilities and for crude oil tankers while in Prince William Sound, in light of new technological developments and changed circumstances;

Describe/Examples:

PWSRCAC continues to participate in reviewing federal, state, and industry contingency plans. These plans include the Alaska Regional Contingency Plan, the Arctic and Western Alaska Area Contingency Plan, the Prince William Sound Area Contingency Plan; and industry plans covering the PWS Tankers and the terminal.

During this recertification period, PWSRCAC staff, volunteers, and contractors took substantial time and effort to monitor the Alyeska/SERVS marine services contractor transition to ECO. Under this contract, ECO now provides key oil spill prevention and response assets for the VMT and associated oil tankers operating in PWS. The transition brought many improvements in spill prevention. Work in this area included reviews of best available technology, monitoring exercises designed to meet requirements set by the ADEC, and reviewing and providing comments on prevention and contingency plan changes resulting from the transition.

PWSRCAC has also worked to comprehensively address the use of best practices in the operation of escort and rescue tug operations. PWSRCAC's work in the area of oil spill prevention and response planning is described on pages 5-10, and 13-14 of the annual report.

b. Monitors periodic drills and testing of the oil spill contingency plans for the terminal facilities and for crude oil tankers while in Prince William Sound;

Describe/Examples:

PWSRCAC is directly tasked under OPA 90 and our Alyeska contract to monitor and report on spill response trainings and exercises. This effort takes considerable staff time, including attendance at many field deployments and large tabletop exercises with Alyeska, PWS Shippers, ADEC, and USCG. Staff and contractors are also frequently involved as members in industry exercise evaluation teams for these drills and exercises. The after-action reports generated from our participation in drills and exercises are shared with our OSPR Committee, and ultimately summarized and shared with the

PWSRCAC Board, industry and governmental partners, and the public through annual Drill Monitoring reports.

With approximately 400 local vessels on contract to perform spill response, PWSRCAC spends a substantial amount of staff time monitoring Alyeska/SERVS fishing vessel program. Some of this interaction comes from monitoring drills and exercises where these vessels are involved, or in attending annual “fishing vessel” training in communities in our region. Other interactions with the fishing vessel fleet are very direct, such as a PWSRCAC-hosted meeting in the spring of 2017. The Council also speaks directly with fleet representatives to discuss the program and pass information back to the fleet, such as explaining contingency planning approvals, public review processes, and updates to spill response policy (e.g., when the dispersant guidelines were updated in Alaska). PWSRCAC also passes along any recommendations or concerns coming from the fleet to ADEC and industry. (More information on pages 13-14 of the annual report.)

c. Studies wind and water currents and other environmental factors in the vicinity of the terminal facilities which may affect the ability to prevent, respond to, contain, and clean up an oil spill;
Describe/Examples:

PWSRCAC cooperatively supports operation of weather stations and cameras in PWS and the Gulf of Alaska. The Council is actively working to establish a weather station at Cape Hinchinbrook and a wind meter at Seal Rocks. Work in 2018-2019 established two metocean weather buoys in Port Valdez: one at the VMT and the other at the Valdez Duck Flats. This data is being used to help guide response planning in case of a spill at the VMT and better understanding of seasonal changes in water circulation (see pages 6 and 10 of the annual report).

PWSRCAC worked with Tetra Tech Canada, Inc. to better define metocean weather conditions present at Hinchinbrook Entrance to PWS that affect the transit of crude oil tankers. The overarching goal of this project was to create a better understanding of the weather at the Entrance, and make this information available to industry, regulators, and PWSRCAC stakeholders.

In May of 2018, results from the multi-year Port Valdez circulation study, conducted with the PWSSC, were presented to the Council’s Board of Directors. This project consisted of field work, conducted over three distinct seasonal time periods, when oceanographic instrumentation and free-floating drifter buoys were used to map circulation within Port Valdez at both a surface and sub-surface level. This has been the most comprehensive study of Port Valdez circulation to date, and Council is hopeful that this, and other weather and circulation data presently being gathered, can help improve spill response modeling in the future.

d. Identifies highly sensitive areas which may require special protection in the event of a spill in Prince William Sound;
Describe/Examples:

PWSRCAC is involved with the GRS deployments that Alyeska conducts annually, in conjunction with representatives from other agencies such as ADEC and USCG. Reports are generated from these efforts so that GRS tactics can be updated and improved. In 2018, the Council monitored the first deployment to include ECO's utility tug vessel *Ross Chouest* since the ECO vessels arrived in PWS. Various attributes and features make this platform better suited, and safer, for this sort of work. During the deployments, all ECO, SERVS, and contracted fishing vessels worked as a cohesive team, and it was highly productive in terms of testing and refining Geographic Response Strategies, as well as working with new equipment.

One of the Council's recent scientific studies focused on identifying highly sensitive areas where forage fish congregate in PWS. In June 2019, working with the PWSSC, the Council sponsored an aerial survey of PWS for forage fish including herring, sandlance, capelin, and eulachon (smelt). These forage fish species are critical components of the PWS marine ecosystem. Similar work has been conducted since the 1990s and the Council plans to continue this work at least through 2022. The forage fish location information from the June 2019, historic, and future surveys can be used to identify environmentally sensitive areas in the event of an oil spill in the region (see page 11 of annual report).

e. Periodically reviews port organization, operations, incidents and the adequacy and maintenance of vessel traffic service systems designed to assure safe transit of crude oil tankers pertinent to terminal operations;

Describe/Examples:

As described on pages 13-16 of our annual report, PWSRCAC personnel monitor maritime operations and, in conjunction with the PWSRCAC Port Operations and Vessel Traffic Systems Committee, analyze issues and make recommendations for improving the navigational safety of TAPS tankers and escort vessels. These activities are carried out by routine tracking of vessel traffic with the assistance of an Automatic Information System in PWSRCAC's Valdez office; recording vessel delays, incidents, near misses, and atypical situations; reviewing proposed rules, regulations, and USCG guidelines; and maintaining a working relationship with shippers, SERVS, ADEC, and USCG. In addition, as described previously, PWSRCAC reviews and comments on state and federal oil spill prevention and response plans, often including recommendations regarding port operations and safety systems.

f. Periodically reviews the standards for tankers bound for, loading at, exiting from, or otherwise using the terminal facilities.

Describe/Examples:

We provide comments when individual oil-shipper contingency plans are renewed every five years and on plan amendments proposed by the shippers between formal renewals. In addition, we review more specific issues from time to time, such as emission standards for tankers and corrosion inspections. Most recently, PWSRCAC provided comments on a major amendment to the Prince William Sound Tanker Contingency Plan that removed

the requirement for ice reports for outbound laden oil tankers and changes to personnel training requirements. Additionally, PWSRCAC has long been active on the issue of reducing the risk of tanker-related invasions of PWS by non-indigenous species, including reviewing and commenting on relevant regulation and legislation at the state and federal levels.

In 2019, the Council released a report evaluating Potential Places of Refuges (PPOR), focusing on those suitable for use by crude oil tankers transiting PWS. This project was initiated from work originally done in 2004, when the Council partnered with ADEC to develop a matrix listing potential places a vessel in distress could be taken that could provide it shelter. The work was further continued in 2015, using the AVTEC Maritime Training Center and experienced marine pilots to reevaluate these sites. Evaluation of these PPORs showed that there are only three sites available that would allow for the safe anchoring of a distressed tanker. The final report and its recommendations were forwarded to the ARRT and NOAA for their consideration (see page 7 of the annual report).

In 2019, when two foreign flagged tankers called at VMT, PWSRCAC worked with ADEC, USCG, Alyeska, and BP to verify vessel capabilities and crew understanding of the safety systems in PWS.

g. Reports findings to local industry, and to responsible State and Federal officials.

Describe/Examples:

The Maritime Operations Program monitors and reviews port organizations, operations, incidents, and the vessel traffic system, interacting with industry and regulators to share PWSRCAC findings, concerns, and issues. PWSRCAC also participates on the Valdez Marine Safety Committee, which is discussed elsewhere in this application.

6. Funding. The Coast Guard will determine whether the advisory group has entered into a contract for funding in accordance with the requirements of 33 U.S.C. 2732(o) and will review the advisory group's expenditure of those funds.

Yes No Describe:

PWSRCAC's primary income source is a long-term contract with Alyeska Pipeline Service Company. In PWSRCAC's fiscal year 2019, the amount was approximately \$3.65 million. In addition, PWSRCAC occasionally receives grant funds for various projects. This last year, PWSRCAC received a grant from the City of Valdez to support the deployment and maintenance of the two weather buoys in Port Valdez. Enclosed are copies of the Alyeska contract along with the current three-year funding addendum to the contract.

Expenditures of funds may be made only on those projects or activities that foster the goals and purposes of the Act. Projects or activities may include those that develop information based on sound scientific and engineering principles that the community can use to improve its ability to prevent or respond to oil spills, or to expand the knowledge base of environmental information

related to terminal or tanker operation. The Coast Guard will review the purpose and impact of each project or activity to determine whether:

a. Expenditures and controls are carried out in a manner consistent with sound business practices;

Yes No Describe: A copy of our most recent third-party financial audit is enclosed.

PWCRAC's audited financial statements and the Form 990 (Return of Organization Exempt from Income Tax) are made available to the public on Council website.

b. Expenditures are reasonably related to the prevention or response to oil spills from tanker or terminal operations, including environmental information, in the advisory group's area of responsibility.

Yes No Describe:

PWSRCAC has processes in place to ensure compliance with the Alyeska contract and with the requirements of the Oil Pollution Act of 1990. Specially, the Executive Director and Financial Manager report annually to the Board of Directors about such matters. Alyeska reserves the right to audit PWSRCAC for contract compliance. PWSRCAC is allowed to conduct activities outside the scope of the Alyeska and OPA 90 so long as Alyeska contract funds are not used.

7. Accessibility of Application. The Coast Guard's review will include an examination of the extent to which the advisory group provided notification to the public via local press releases that it has applied for certification and, the extent to which the advisory group has ensured that the application is accessible for public review.

Describe:

PWSRCAC will inform the public of its recertification application through news releases (see Attachment 2) and via notifications to recipients on various PWSRCAC email lists. Copies of the application will be available on the PWSRCAC website and free in printed form by request to the PWSRCAC offices in Anchorage and Valdez.

Attachment 1
Supplement to Item 3, "Scientific Work"
PWSRCAC Recertification Questionnaire
Nov. 22, 2019
Summary of Reports Produced and Experts Consulted

Reports produced overview

- A Review of Literature Related to Human Health and Oil Spill Dispersants.** Merv Fingas, Spill Science, April 2018.
- A Review of Literature Related to Oil Spill Dispersants.** Merv Fingas, Spill Science, June 2017. Elise DeCola, Nuka Research & Planning, LLC. September 2017.
- A Specification and Capability Comparison of the Tidewater - Gulf Service to the Edison Chouest Offshore - Ross Chouest.** Little River Marine Consultants, November 2017.
- Alaska's Oil Spill Response Planning Standard: History and Legislative Intent.** Nuka Research & Planning Group, LLC, August 2018.
- Analysis of federal and state ballast water management policy as it concerns crude oil tankers engaged in coastwise trade to Alaska.** Danielle Verna, January 2017.
- Circulation in Port Valdez, Alaska, measured by Lagrangian Drifter Experiments, Towed Acoustic Doppler Current Profiler and Hydrographic Profiles in June and September 2016, and March 2017.** Shelton M. Gay III, Ph.D., March 2018.
- Comparison of Capabilities Between Prince William Sound Emergency Towing Package and IMO/SOLAS Emergency Towing Package for Tankers.** Little River Marine Consultants, February 2018.
- Coping with Technological Disasters – A User-Friendly Guidebook – Version 3.** PWSRCAC, January 2019.
- Development of the Current Prince William Sound Escort System: Regulations, Analysis, and System Enhancements.** Nuka Research and Planning Group LLC, June 2017.
- Drill Monitoring Annual Report 2016, 2017, and 2018.** PWSRCAC, August 2018.
- Hinchinbrook Entrance Wind and Wave Extremes.** Tetra Tech, November 2018.
- Industry and Class Standards for Escort Tugboat.** Little River Marine Consultants and PWSRCAC, January 2017.
- Long Term Environmental Monitoring Program - Final Report: 2016, 2017, and 2018 Sampling Results and Interpretations.** James R. Payne, Ph.D. and William B. Driskell, August 2017, September 2018, and July 2019.
- Prince William Sound Oil Spill Recovery Optimization Analysis.** Nuka Research & Planning Group, LLC., February 2017.
- Recommendations for Initial and On-going Evaluation of New Prevention and Response System Readiness in PWS.** Little River Marine Consultants and Nuka Research & Planning, LLC., September 2017.
- Review of Exercise and Incident Reports for Prince William Sound, 1997-2006.** Little River Marine Consultants, April 2018.

Review of the Proposed New Escort and Support Tugs for Tanker Operations in Prince William Sound. Little River Marine Consultants, February 2017.

September 2017 Berth 5 Oil Spill - Sampling Results and Interpretations. James R. Payne, Ph.D., William Driskell, and PWSRCAC, April 2018.

Ship Simulation and Mariner Study of the Maritime Implications for Tank Vessels Utilizing Potential Places of Refuges, Mid-Prince William Sound, Alaska. Safeguard Marine, LLC., January 2017.

Valdez Marine Terminal Secondary Containment Liner Integrity Evaluation. Geosyntec Consultants, Inc., October 2018.

Weather Buoy Demonstration Project. Prince William Sound Science Center, August 2018.

Wind Speed and Wave Height at Seal Rocks Buoy During Outbound Tanker Transits, 2010-2017. Nuka Research & Planning, LLC., February 2018.

Scientific experts, universities and scientific institutions consulted

William B. Driskell
Seattle, Washington

Environment Canada
Bruce Hollebhone
Ben Fieldhouse
Ottawa, Ontario, Canada

Merv Fingas
Spill Science
Edmonton, Alberta, Canada

Geosyntec Consultants
Jay L. Griffin, P.E.
Anchorage, Alaska

Harvey Consulting, LLC
Susan Harvey
Eagle River, Alaska

Little River Marine Consultants
Captain Nathaniel Leonard
East Boothbay, Maine

NOAA Fisheries, Northwest Fisheries Science Center
John Incardona Ph.D.
Seattle, Washington

Micro Specialties, Inc.

Richard M. Brown
Wasilla, Alaska

Newfields Environmental

Eric Litman
Rockland, Mashusetts

Nuka Research & Planning Group, LLC.

Tim Robertson
Elise DeCola
Sierra Fletcher
Seldovia, Alaska

Oregon State University

Peter Hoffman
Corvallis, Oregon

Payne Environmental Consultants, Inc.

James R. Payne, Ph.D.
Encinitas, California

Portland State University, School of the Environment

Danielle Verna

Prince William Sound Science Center

Rob Campbell, Ph.D.
Scott Pegau, Ph.D.
Shelton Gay, Ph.D.
Cordova, Alaska

Resolve Maritime Academy

Jeff Johnson
Vancouver, Washington

Robert Allan Ltd.

Robert G. Allan, P.Eng.
Vancouver, Canada

Safeguard Marine, LLC

Captain Jeff Pierce

San Jose State University, Moss Landing Marine Laboratories

Jonathan Gellar, Ph.D.
Moss Landing, California

Smithsonian Environmental Research Center

Linda McCann
Gregory Ruiz, Ph.D.
Tiburon, California and Edgewater, Maryland

USGS Davis Field Station

Lizabeth Bowen, Ph.D.
Davis, California

Attachment 2
News Release
PWSRCAC Recertification Questionnaire
Nov. 22, 2019

Prince William Sound Regional Citizens' Advisory Council

3709 Spenard Road, Suite 100
Anchorage Alaska 99503
907-277-7222/Fax: 907-277-4523

130 S. Meals, Suite 202 /P.O. Box 3089
Valdez, Alaska 99686
907-834-5000/Fax: 907-835-5926

News Release

DATE

Contact: Brooke Taylor
brooke.taylor@pwsrcac.org
907-273-6228

Recertification application available for public review

The Prince William Sound Regional Citizens' Advisory Council is seeking recertification as the alternative voluntary advisory group for Prince William Sound, as authorized under the Oil Pollution Act of 1990 (OPA 90). The application has been submitted to the U.S. Coast Guard, which is charged with assessing whether the council fosters the general goals and purposes of OPA 90 and is broadly representative of communities and interests as envisioned under OPA 90.

The recertification application is available for public review on the council's website at www.pwsrcac.org. To obtain a printed copy, contact the Prince William Sound Regional Citizens' Advisory Council, 3709 Spenard Road, Suite 100, Anchorage, Alaska 99503. Call (907) 277-7222 or toll-free (800) 478-7221.

Comments on the application should be sent to:
Commander, 17th Coast Guard District (dpi)
PO Box 25517
Juneau AK 99802

Attn: LT Ian McPhillips
Inspections & Investigations

Comments may also be emailed to LT Ian McPhillips at Ian/.P.McPhillips@uscg.mil.

The Prince William Sound Regional Citizens' Advisory Council, with offices in Anchorage and Valdez, is an independent non-profit corporation whose mission is to promote environmentally safe operation of the Valdez Marine Terminal and the oil tankers that use it. The council's work is guided by the Oil Pollution Act of 1990, and its contract with Alyeska Pipeline Service Company. The council's 18 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as aquaculture, commercial fishing, environmental, Native, recreation, and tourism groups.
