

Introduction

Background



Between March 1989, and February 1992, the Federal Government and the State of Alaska simultaneously engaged in parallel efforts to create oil spill planning and response frameworks to address lessons learned in EVOS. The Federal Plan established 13 planning regions throughout the United States and territories, each with a Regional Contingency Plan, approved and maintained by the respective RRT, and planning areas within the regions, each with an Area Contingency Plan, maintained by Area Committees under the leadership of the pre-designated Federal On-Scene Coordinators. The state plan called for a Statewide Master Plan, and divided the state into 10 planning regions, each with its own spill contingency plan. In 1992, ADEC, USEPA, and USCG agreed to pool resources and create the Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Discharges/Releases, known by us...

Alaska Unified Plan

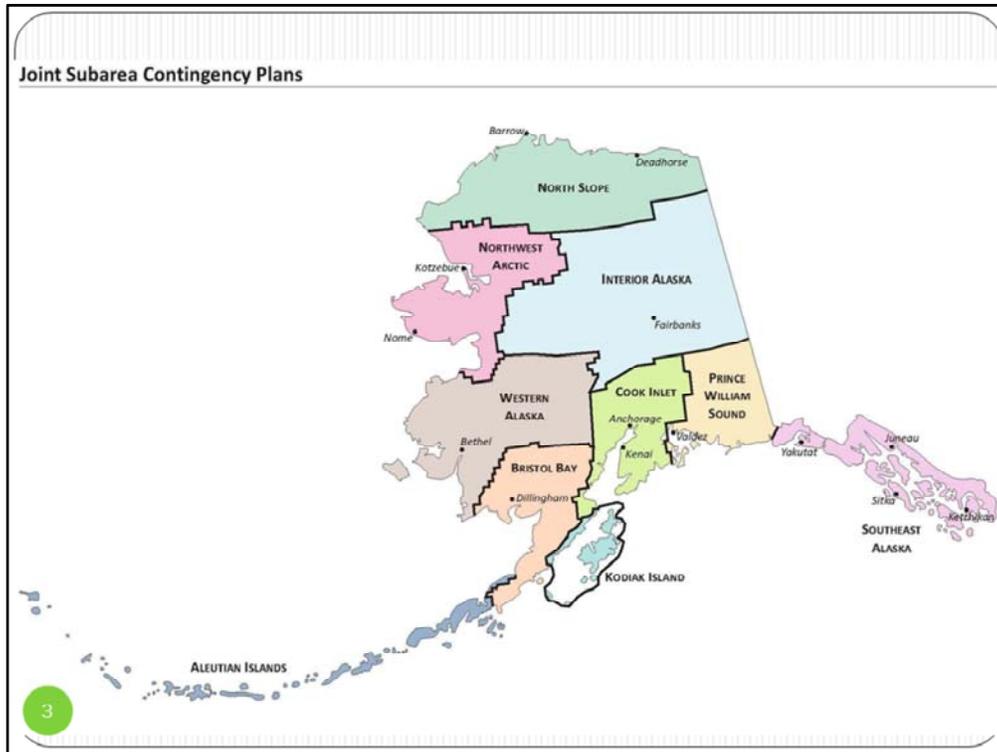
- **The Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Discharges/Releases.**
- **First Promulgated May 1994**
- **Joint Plan / Statewide Guidance**
 - **Federal**
 - **State**
 - **Local**

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as the Unified Plan. The UP was promulgated in May of 1994, and met all of the existing State and Federal regulatory requirements for spill planning.

For any given point on the map of Alaska, there is one government spill response plan, which consists of two volumes. The first is the Alaska Unified Plan, which contains statewide guidance, policies, and response procedures, and the second volume, is the applicable subarea contingency plan. The Unified Plan is updated by the ARRT and signed by the three ARRT Chairs.

As noted earlier, this system of plans was determined to have met regulatory requirements as they existed in 1994. Over the past 20 years, however, federal agencies have issued policy directives and regulatory guidance to Coast Guard Sectors and EPA Regions, to implement policy changes and lessons learned following The World Trade Center attack, Hurricane Katrina, The Deepwater Horizon blowout, and other major oil and chemical releases. The spill response agencies in Alaska have largely ignored these directives, as implementation would require a major overhaul of the planning framework, and would require the total buy-in of all three spill response agencies.



Here you see the ten Subareas, or “regions” as designated by AK state regulations. As you might imagine, it can be very challenging to keep these SCP’s current, while ensuring appropriate input from stakeholders, natural resource trustees, and tribal governments. Many plan updates have taken longer than expected, causing cascading delays, since it is often the same agency representatives working to update plans across the state.

Last year, representatives from the State of Alaska proposed a restructuring of the Alaska spill response planning system, to simplify the requirements for spill planners, and to adopt the planning format and policies of the rest of the U.S.

Along with LCDR Matt Mitchell (USCG), and Steve Russell (ADEC), I was asked to explore the possibility of adopting the planning framework currently in use elsewhere in the U.S.

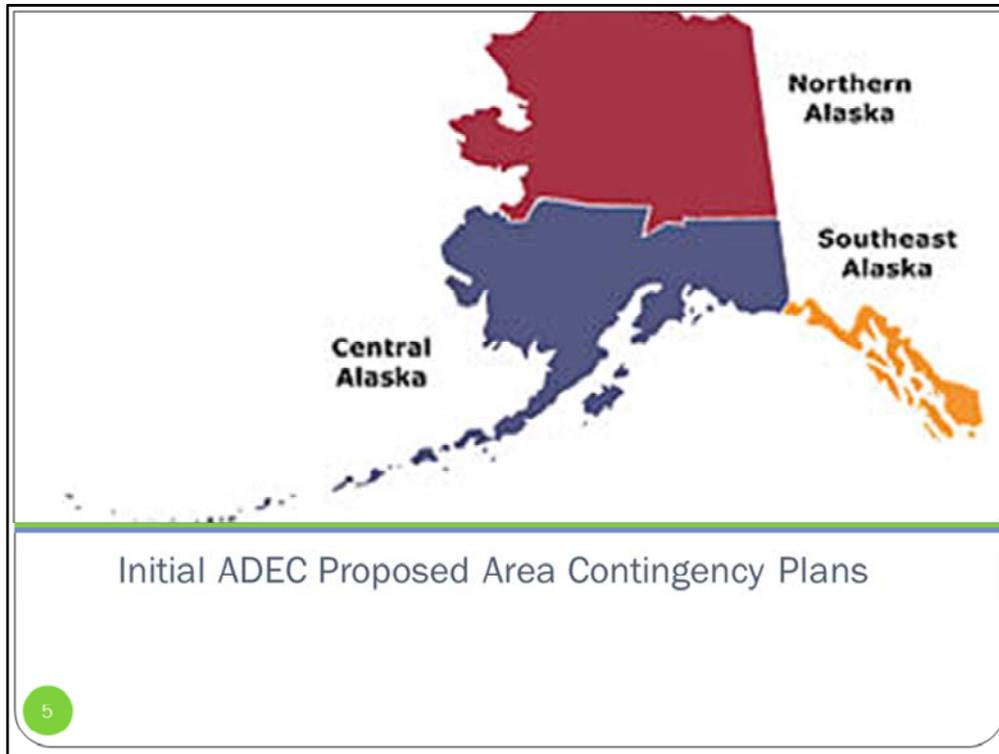
Alaska Plans vs. Lower 48

	Alaska	Lower 48
Planning Structure	UP & SCP's	RCP & ACP's
Plan Format	From OPA 90	From ICS
Regional Planning Responsibility	RRT	RRT
Area Planning Responsibility	RRT/OSC	OSC
Planning Committees	Temporary SAC as needed	Standing Area Committees
Update Cycle	2-3 plans per year + UP	1 plan per year + UP
Familiarity to incoming planners	Not the same. Alaska is different.	Similar to other ACP/RCP

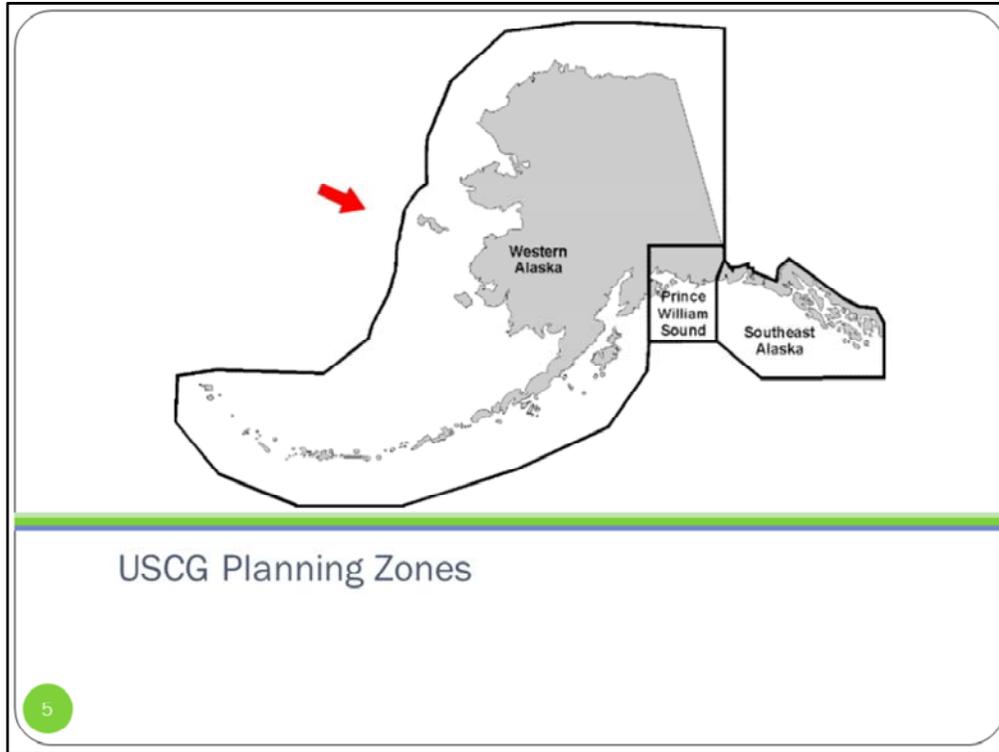
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Our first task was to identify how Alaska's system differs from the prevailing planning system.

In this chart I've attempted to note the differences between the planning framework adopted by agencies in Alaska, vs. agencies in the lower 48.

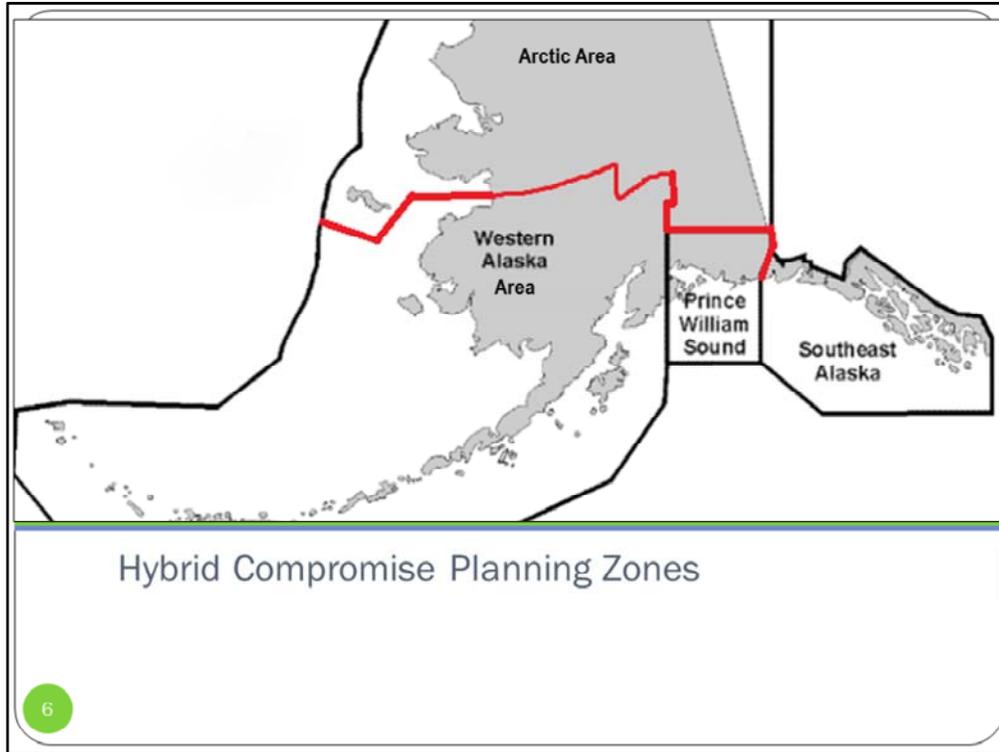


The state of Alaska initially proposed reducing the number of Planning areas from 10, to 3, to create efficiencies in planning efforts, by eliminating redundancy among the various Area Plans. They proposed an area delineation based on the areas of responsibilities of the three State On-Scene Coordinators.



These are the USCG's planning boundaries, called Captain of the Port Zones, as established in the national contingency plan. The Coast Guard initially proposed that future planning boundaries respect these zones.

Should all three agencies agree move forward with a major revision, the most likely outcome would be a hybrid set of boundaries, establishing four planning areas in Alaska, each with it's own Area Contingency Plan. This would bring Alaska into conformity with the rest of the Coastal areas of the U.S.



Here is an approximation of the Planning Area boundaries that Steve, Matt, and I recommend. Note the red line follows the borough boundaries, much the same as the State response boundaries do. We are further proposing to maintain the existing subarea plans, as annexes to the ACP's. As such, all of the subarea boundaries would remain unchanged, with the exception of the PWS subarea, moving so as to reflect the COTP zone boundary.

Proposed Milestones

3/30/2016 – Brief OCS's for buy-in to proceed

5/25/2016 – Brief ARRT for buy-in to proceed

6/1/2016 – Solicit stakeholder input for draft boundaries, ACP conceptual model, and timeline for transition.

9/15/2016 – Complete framework design, begin compiling SCP/UIP sections to create RCP and ACP's. Begin State Regulatory amendment process.

11/15/2016 – Solicit public/tribal/SERC/ARRT comment for draft ACP/RCP.

3/1/2017 – Promulgate RCP/ACP's. Update responsibility shifts to Area Committees.

QUESTIONS?

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