



Alaska Department of Environmental Conservation

Division of Spill Prevention and Response

Prevention, Preparedness, and Response Program

Response Exercise Program Improvements

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Prevention • Preparedness • Response

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Abbreviations and Acronyms

ADEC	Alaska Department of Environmental Conservation
Plan	Oil Discharge Prevention and Contingency Plan
EPA	United States Environmental Protection Agency
FY	Fiscal Year
MAD	Mutual Aid Drill
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NPREP	National Preparedness for Response Exercise Program
OSC	On-Scene Coordinator
PPRP	Prevention Preparedness and Response Program
RSA	Reimbursable Service Agreement
SCP	Subarea Contingency Plan
SOSC	State On-Scene Coordinator
SPAR	Division of Spill Prevention and Response
UP	Unified Plan
USCG	U.S. Coast Guard

Response Exercise Program Improvements

Overview

The Alaska Department of Environmental Conservation (ADEC) is the lead state agency for prevention of and response to oil and hazardous material releases. Since 1995, ADEC's Division of Spill Prevention and Response (SPAR) was composed of two programs with primary responsibility for prevention, preparedness and response activities: the Industry Preparedness Program (IPP) and the Prevention and Emergency Response Program (PERP). In the twenty years since the creation of these programs, the landscape of oil spill prevention, preparedness and response has evolved to a more complex and integrated suite of policies, plans, strategies and decision-making processes. To adapt to these changes and the anticipated funding shortfalls, SPAR reorganized in FY16 and merged the IPP and PERP programs to form the Prevention, Preparedness and Response Program (PPRP).

The mission of the PPRP is to protect public health, safety and the environment by preventing and mitigating the effects of oil and hazardous substance releases and ensuring their cleanup. Prevention of an oil or hazardous substance spill is the primary focus of the PPRP and is the most cost-effective way to fulfill our mission statement. While prevention is key, we also recognize that spills will happen. Preparedness is critical to minimizing impacts to the environment and it is essential for ensuring qualified personnel and response equipment are available to manage and respond to spills. Finally, when spills do occur, PPRP responders provide technical assistance to the public, oversee cleanup operations and ensure the trust resources of the State of Alaska are protected for its citizens.

As a part of this reorganization, PPRP staff have been assessing multiple internal programs to strengthen and align our regulations with our mission and reduce or recover costs while maintaining the effectiveness of our prevention, preparedness and response activities. PPRP staff have identified the response exercise program as a key component of enhancing preparedness and response capability for the entire Alaska response community including State, federal, local agency partners and regulated operators. Additionally, with the passage of HB72 in 2015 and the subsequent implementation of a refined fuel tax to support PPRP's mission, the House Finance Committee has charged ADEC with the task of identifying improvements to the response exercise program to reduce costs for both ADEC and industry. In the past, the former IPP and PERP programs had related and sometimes overlapping responsibilities that resulted in difficulty identifying and agreeing on the top priority response exercise goals. Programmatic clarity and consistency will create better use of staff time and reduce the financial burden for both ADEC, the regulated industry and the larger response community.

This paper presents a framework to create deliberate, structured and measurable improvements to PPRP's response exercise program. This framework is based on a set of guiding principles, goals and measurable objectives. Changes to the Area Committee process and other processes that have a federal nexus cannot be completed without the support and agreement from our federal partners. These recommendations have been identified through industry input, consideration of stakeholder and federal agency priorities, investigating model programs in other areas and utilizing PPRP staff knowledge. ADEC will continue the discussion of these recommendations with the response community as these goals and objectives are refined and implemented. ADEC's initial prioritization and key steps for implementing the improvements is presented in Appendix A.

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Guiding Principles

Planning and implementing improvements to the response exercise program is a complex process. The management team has developed guiding principles to keep the revision process focused on the primary revisions needed. The guiding principles are:

- Reduce costs to the department and industry.
- Maintain or improve current levels of response readiness.
- Encourage innovation and improvement.
- Maintain consistency statewide.
- Strengthen and broaden response capability and coordination throughout the response community.
- Verify compliance with regulations in regards to companies' ability to adequately respond to a spill.

Goals and Objectives

The guiding principles were used to develop goals and measurable, action-oriented objectives to implement the program improvements.

Goal #1: Strengthen Area Committees' roles in response exercises.

An Area Committee is the forum established to facilitate communication between response organizations and the public regarding spill response planning and preparedness. They are required by the Code of Federal Regulations for each subarea identified in the Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Spills (the Unified Plan). Each Area Committee is co-chaired by a regional State On-Scene Coordinator (SOSC) from ADEC-PPRP and the Federal On-Scene Coordinators (FOSC), from either or both the USCG and the United States Environmental Protection Agency (EPA) depending on the jurisdictional roles within each subarea. The co-chairs may select to include members from local government representatives, industry, non-governmental organizations and other organizations or persons.

Formalizing a clearer role and creating useful tools that promote Area Committee involvement in response exercise scheduling, design, implementation and evaluation will minimize unnecessary duplication of response exercises and will reduce costs for agencies, industry and stakeholders; greater collaboration should also maximize opportunities to engage the broader response community in developing response practices and relationships that will better prepare all parties for a real response.

Each Area Committee member and participant has specific goals for response exercises. Regulated industries need to conduct response exercises to meet both the required federal National Preparedness for Response Exercise Program (NPREP) guidelines and State Plan commitments; ADEC uses response exercises to verify the adequacy of Plans and to ensure they can be implemented effectively by the related entity; the USCG and EPA conduct Area response exercises to ensure adequate response infrastructure for each Subarea; local governments may wish to incorporate community participation in response exercises; landowners and other potentially impacted stakeholders want to ensure they have a role and voice in response decisions and that their concerns are considered. All jurisdictional agencies need to be confident in our coordination and communication protocols when oil or hazardous material spills occur from either regulated operators with response plans in place or unregulated operators that are not required to have response plans. A key outcome of response exercises of all types is that all

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parties gain experience and strengthen relationships that will be critical in a real response. These various goals, requirements and desired outcomes will be most effectively coordinated through each Area Committee. ADEC's goal is to create a structure and practical tools that support and strengthen the ability of the Area Committees to be the effective point of coordination for all response exercises in their areas.

Objective #1-1: Reduce the number of Subareas.

Subareas are unique to Alaska because our Statewide Master Plan is cooperatively developed with our federal partners requiring that our required Statewide Master Plan and Regional Plans also meet federal requirements for their planning documents. Alaska's combined plan is known as the Unified Plan. There are currently 10 Subareas for response planning in Alaska that each have an Area Committee to contribute to response planning efforts. Given budget and staffing levels, ADEC cannot effectively support 10 separate Area Committees in work related to response exercises or any other Area Committee tasks. ADEC is working with the USCG and EPA to agree on a reduced number of Subareas in Alaska. The number and boundaries of the Subareas will be based on practical elements of the response infrastructure in Alaska, ADEC budget and staff availability. To complete the reduction, ADEC will introduce regulatory revisions to 18 AAC 75.495-496 to codify corresponding boundaries for Regional Plan boundaries and Nontank Vessel response operations boundaries. A regionalized Subarea boundary will strengthen the opportunity of regional response community members to be more actively engaged in response exercises.

Objective #1-2: Facilitate a Statewide charter that establishes baseline response exercise roles and responsibilities for Area Committees.

To promote effective Area Committee involvement in scheduling, designing, implementing and evaluating response exercises, each agency's role should be clearly identified. Recognizing that Area Committee representatives come from different backgrounds, a charter should be developed to clearly define statewide goals and objectives to maintain consistency across subareas as well as allow flexibility for Area Committees to define how to accomplish those roles in their subareas.

The On-Scene Coordinator's Work Group was established to coordinate preparedness and response activities on a statewide level. The On-Scene Coordinators that participate in the On-Scene Coordinator's Work Group are the lead representative for their organization for each Area Committee within their region. Based on their roles and experience, the On-Scene Coordinator's Work Group is ideally positioned to make statewide recommendations on common objectives, roles and responsibilities of the Area Committees and their relationship to response exercises. We recommend that the On-Scene Coordinator's Work Group facilitate the development of the statewide Area Committee charter.

Goal #2: Develop a response exercise guidance document.

ADEC believes that having a working response exercise guidance document is a best practice that needs to be implemented in Alaska. Many states, including Alaska, with oil exploration, production, marine or pipeline transportation activities in State waters or on land have regulations that require operators to demonstrate their preparedness to respond to a spill from their activities. Requirements vary between states, however; some programs have clearly specified expectations for regulated industry to demonstrate their response capabilities, have communicated those expectations publically and have established a process to test the response community against those requirements and expectations.

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ADEC should work with other oversight agencies, stakeholders and industry to create an Alaska Response Exercise Planning Manual. This guidance should specify the steps for developing exercise objectives and jointly planning exercises to maximize the scope of strategies, tactics and deployments exercised over a multi-year period. The response exercise guidance document will be developed in partnership with other oversight agencies and industry. This guidance will clearly identify processes for successful response exercise planning and execution, allow for flexibility based on the size of the operation, and potential risk of a spill and encourage innovative approaches to response exercises that benefit the response community.

Objective #2-1: Identify and evaluate selected response exercise programs for applicability in Alaska.

Response exercise programs are not unique to Alaska. For example, our partners in the Pacific States/British Columbia Task Force (Washington, Oregon, California, Hawaii and British Columbia) also have exercise programs for their states/provinces. PPRP has begun to examine other programs to determine if any portions of their programs are appropriate for use in Alaska. In October 2015, PPRP staff attended a Polar Tanker exercise in the State of Washington. We identified a number of Area contingency planning and exercise ideas that may be valuable in Alaska.

PPRP will continue to investigate how the Area Committee and individual State programs cooperate for exercise scheduling and implementation, how Area Plans (equivalent to Alaska's combined Unified and Subarea Plans) are similar or different and how differences in state and regional infrastructure and response resource availability may impact response exercise and response strategies elsewhere. When other programs are identified, ADEC staff will contact representatives from those programs to gather more information on balancing the cost of exercises with meeting the statutory requirement to protect the environment, example regulations that implement the exercise program and other cost-effectiveness considerations. PPRP will determine the applicability of these program elements to Alaska's unique operational environment and explore innovative approaches to applying appropriate elements to Alaska's response exercise program.

Objective #2-2: Create guidance for jointly planning response exercises with industry to develop exercise objectives and reduce redundancy of exercise requirements.

ADEC and industry companies should strive to be more proactive while planning complex exercises. Designing an exercise that meets industry, state, and federal agency objectives is a complex process. These objectives are not always aligned. Industry often does much of the exercise planning internally and presents the proposed exercise plan to PPRP after a significant amount of planning work has already occurred. This creates a reactive situation for both industry and ADEC staff if the industry proposed objectives do not align with ADEC goals for exercising specific components of the plan. Further, the purpose of the scenarios in the Subarea Plans and the scenario(s) in the industry plans are different. The Subarea Plan scenarios address the average most probable, maximum most probable, and worst case discharges possible in the planning area. Industry plan scenarios focus on the specific response planning standards and the unique response operations of each plan holder. This difference in purpose and scale results in multiple overall goals and specific objectives being tested at the same exercise. ADEC strives to be a resource for helping industry develop exercises that are effective, meaningful and instill a sense of accomplishment for the entire response community. Proactive planning can accommodate multiple

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goals and objectives that meet the requirements of agencies, industry, and the broader response community.

There is a perception that some objectives are used in exercises too frequently when others might provide greater value for the response community. For example, application and approval processes for non-mechanical countermeasures (dispersants and in-situ burning) are often tested by the same operator at successive response exercises. It is important that all critical components of response capability are effectively demonstrated during the five year plan approval cycle rather than focusing on a limited suite of high profile spill response methods. A planning manual that requires design teams to review past exercises and include objectives based on lessons learned from an operator's previous exercises, will result in more cost-effective and productive exercises.

Objective #2-3: Determine the right level of ADEC participation in response exercises.

Determining the right level of ADEC participation at response exercises is key to the department reducing costs and maintaining the effectiveness of the response exercise program. These two factors are often conflicting.

Thoughtfully scaling State staff participation at exercises will reduce costs while maintaining active involvement needed to support the PPRP mission. In other states, government staff from multiple agencies are integrated into the responsible party's response structure. State and federal agency staff often occupy key staff positions within that organizational structure under the responsible party's Section Chief. ADEC's oversight role has historically required mobilizing a full incident management team to response planning standard or equivalent exercises. This is not cost effective and doesn't necessarily benefit the response.

The number of ADEC staff mobilized for an exercise should depend on the size and scale of the exercises. At a minimum, key roles staffed by State personnel for large exercises will include the State On-Scene Coordinator, Environmental Unit, Public Information, Liaison and evaluators. Some of these positions may be staffed by trained State agency personnel from Departments other than ADEC. Other exercise evaluators, field observers, state logistics and documentation personnel may also attend an exercise as needed. ADEC will continue to investigate the practice of integrating State personnel into the overall response team.

The way the State of Washington conducts their "worst case scenario" exercises is very interesting and aspects of it should be considered for Alaska. It is Washington policy, which is included in the NW Area Contingency Plan that qualified members of the Department of Ecology (Ecology) will lead the Environment Unit, be the Public Information Officer and be the Liaison Officer in both response exercises and spill responses. If a qualified Ecology member is not available, a qualified person from another agency or the responsible party may fill those roles.

Goal #3: Establish multi-year response exercise scheduling for use by the response community.

In most cases, a response exercise is designed to meet the requirements of multiple jurisdictions including State, federal and local requirements. ADEC's regulations allow us to conduct no more than two response exercises per year at a regulated facility. We may require a response exercise program and

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schedule to be included in an approved Plan if they meet certain risk factors. With the exception of State initiated unannounced response exercises or specific Plan requirements, industry sets exercise objectives and when exercises are held. For many regulated operators, scheduling occurs in coordination with ADEC and federal oversight agencies, but there is no requirement for coordinated scheduling unless it is included in a Plan. Often, ADEC receives very short notice from a Plan holder about dates for an exercise and department staff are unable to participate in the design and occasionally unable to observe the exercise. Exclusion from the design phase has led to conflicts in objectives, unclear expectations, a culture focused on “exercise credit” and a pass-fail mentality. Unobserved drills are a missed opportunity for the department to confirm Plan compliance. It is our objective to establish a response exercise scheduling tool to assist both agencies and industry in their exercise planning and budgeting efforts which may result in reduced redundancy between response exercise requirements.

Objective #3-1: Establish an interactive multi-year response exercise scheduling tool that will be used by all regulated operators in Alaska and all oversight agencies that are members of Area Committees.

Establishing a long-term, web-based response exercise scheduling tool will allow agencies and industry to jointly set exercise dates, exercise planning timelines and allow both agencies and industry to include exercises in their budget cycles. Increasing long-term coordination and developing planning schedules will prevent large exercises from being scheduled concurrently as has occurred in the past. Being able to budget better for exercise expenses years in advance will be a valuable tool for both government and industry. Currently, ADEC maintains an exercise schedule that is distributed monthly via email to response community members. Input on the schedule and notifications of upcoming exercises may occur between industry and their Plan reviewer. Once the date is set, the information is passed to the ADEC drill administrator for inclusion on the next exercise schedule. A web-based schedule that is accessible to everyone will result in cost and time efficiencies and increase awareness of exercises being conducted for the entire response community.

PPRP will take the lead to develop this tool and, in close collaboration with Area Committee members, determine guidelines for use and scheduling exercises. These guidelines will be included in the guidance document identified in Goal #2. The long-term aspect of this objective is that the Area Committees will jointly and cooperatively utilize the tools developed by ADEC. The scheduling tool will meet the needs for planning regulated operator response exercises, government led response exercises, or any other response exercises determined necessary by Area Committees.

Goal #4: Maximize preparedness value of response exercises while reducing the cost to state and industry.

Innovative approaches to exercises can result in valuable training, enhanced response preparedness and reduced costs for exercises throughout the state. Great emphasis has been placed on reducing the cost of response exercises for industry and government, but there are no compiled sources documenting those costs. Currently, ADEC does not have a baseline cost analysis of how much it costs to host or attend an exercise from either the government or industry perspective. The objectives below have been developed to reduce costs and maximize value of response exercises.

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Objective #4-1: Gather economic data from industry and government to determine the cost of response exercises.

Costs for both government agencies and industry to conduct or attend an exercise is dependent on the scale of the exercise and the role each organization plays at the exercise. PPRP staff will work with ADEC's Economist to identify information to request from industry that will allow us to have an idea of the range of response exercise costs. PPRP staff will also gather available information on the cost of State participation at exercises. The cost analysis report can help shape the decisions made to reduce the financial burden of exercises while maintaining response readiness.

Objective #4-2: Establish a tiered response training and exercise approach to address different scales of industry in Alaska.

The improvements to the response exercise program should reflect the variety of regulated operations in Alaska. The requirements for an exercise should reflect the company's operations, potential threat to the environment and readiness required in their approved Plan. In concert with determining the right level of PPRP staff participation at exercises, a tiered exercise approach will result in cost savings for the department by better defining the department's role in smaller exercises and will result in more meaningful and cost effective exercise expectations for small operators.

Objective #4-3: Identify opportunities for collaboration with Primary Response Action Contractors (PRACs) and industry on equipment testing and training.

Currently, each regulated entity is responsible for holding their own individual response exercises. According to their Plan each entity must be able to supply a specific number of trained individuals for tasks associated with spill response and specific quantities of spill response equipment. Many small and mid-sized companies rely on their Primary Response Action Contractors or other contractors to supply equipment and trained staff for spill response operations and the incident management team including during exercises. This can result in the same contractors conducting near identical deployment exercises for different clients within a short timeframe. For smaller companies in particular, directly evaluating the PRAC's ability to respond to a spill could result in cost savings by spreading deployment costs among multiple member companies. This would maximize the preparedness value and help ADEC and industry reduce costs. ADEC will look at different ways to verify that the Plan holder is capable of conducting initial response actions, which occur before the PRAC is present, that meet the requirements of their Plan.

PRACs often have highly experienced trainers for subjects that relate directly to PPRP staff, including Hazardous Waste Operator training and equipment testing and training. Developing joint trainings with PRACs and their member companies can establish working relationships between PPRP staff and industry and create a common operating picture where responders share common knowledge, terminology and communication protocols.

Objective #4-4: Develop a "mutual aid" concept for testing multiple Plan holders at once.

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During a large spill event, resources for the entire region are likely to be engaged in the response. This could include using resources from multiple companies to contain and control the source of the spill and recover the spilled product. The current response exercise structure focuses on verifying the ability of an individual company to implement their approved Plan and verifying that the Plan is adequate.

Operationally, many small to medium sized companies such as fuel barge companies that operate in rural Alaska meet their response planning requirements through Memorandums of Understanding (MOU) or Memorandums of Agreement (MOA) between themselves and other regulated companies in addition to their PRAC memberships. In concert with Objective #4-3 above, improvements to the response exercise program should maximize the testing of shared resources agreements and promote the participation of multiple Plan holders in Subarea response exercises. All Plan holders participating in a mutual aid drill would be responsible for leading the exercise on a rotating schedule. Bringing together a larger group from the response community may help facilitate new ideas and knowledge sharing. Sharing information and experience more widely helps ensure the response community as a whole is ready and able to respond to an actual spill.

An example of a long-standing response exercise benefiting multiple Plan holders is the North Slope Mutual Aid Drill or MAD. Regulated industries operating in the North Slope Borough who are also members of the PRAC Alaska Clean Seas participate in a shared response exercise each year. The member companies take turns leading the exercise, creating an exercise scenario that reflects their individual Plan, but requires the shared personnel and equipment resources of the other member companies. We will also test a practice in which representatives of multiple companies from the same area participate as personnel in the IMT during large response exercises.

ADEC believes a focus on training and mentoring during a response exercise may be beneficial to Plan holders that are members of the same PRAC who share the PRAC's resources and other commonalities. ADEC will propose ways in which these types of mutual aid response exercises may be accomplished while still ensuring that each regulated company is meeting their individual readiness and response requirements.

Goal #5: Prepare regulation revisions as necessary to accomplish the improvements to the response exercise program.

In order to meet the guiding principles of maintaining the effectiveness of the response exercise program while lowering costs to both ADEC and industry, some changes to the existing regulations may be required. PPRP staff anticipate that procedural and policy changes will be able to address many needed actions. However, we will prepare regulatory revisions as necessary to implement response exercise improvements. If changes to the Unified and Subarea Plans are needed, we will work with the Alaska Regional Response Team and Area Committees to amend those plans in a timely manner.

**APPENDIX A: Department of Environmental Conservation Alaska Response
Exercise Program Improvements Prioritization and Key Steps**

Response Exercise Program Improvements

Department of Environmental Conservation Alaska Response Exercise Program Improvements Prioritization and Key Steps

The Department of Environmental Conservation planning and implementing improvements and cost saving measures to the Alaska Response Exercise Program is an ongoing complex and dynamic process. There are many moving pieces that need to be coordinated, and adjustments will be needed as work continues on the outlined tasks below.

- The primary and immediate task is to right-size the number of Department staff that participate in exercises.
- Since November 2015, the Department has been assertively working with federal partners to propose a reduction of ten Subarea Planning Units to three distinct Area Plans. It is believed this will be the most significant paradigm shift in overall efforts to reduce costs and make the exercise program more efficient and effective because:
 - This would better align Alaska with the National Response Framework.
 - There is not sufficient staff and monetary resources to effectively support ten Subarea Committees, including having them play a more substantial role in regional exercise scheduling, design, and implementation.
- In September 2015, the Department increased research into how other states design, conduct, and evaluate exercises. This includes evaluation of which tools or processes may be useful in Alaska and how they may be applied, and which tools or processes cannot be used effectively here.
- Department IT staff are working to develop an interactive online exercise scheduling tool to improve the ability to plan and schedule exercises, and improve the ability to anticipate costs to the State and its partners for conducting response exercises throughout the year. A tool developed by the State of Washington is being used as an example, but the Department's tool will be tailored to fit Alaska's needs.
- Economic data gathering and analysis has been initiated with the Department's economist to identify what costs have been, and to set up a mechanism to evaluate the level of cost reduction achieved by implementing specific changes – both in the near term and over the next several years.
- The Department's economist is working to identify data that can be requested from industry, on a voluntary basis, to help determine if measures undertaken as an agency, and in concert with partners, helps reduce costs.
- Collaboration will take place with Primary Response Action Coordinators (PRACs) to identify ways to maximize the value of exercises for multiple PRAC members. The Department has initiated this approach in the last two years, and will work toward expanding it across various regions as an on-going mid-range project. This effort includes expanding the mutual aid exercise approach throughout Alaska.
- As a mid-to-long range project, the Department will work to develop a tiered approach for exercise requirements, evaluating the type and frequency of exercises that should be conducted for facilities based on risk and operational criteria.
- Over the long term, the Department will develop clear regulations governing Alaska's Response Exercise Program for regulated facilities and coordination with the response community.