



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

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MEMBERS

February 4, 2014

Alaska State
Chamber of
Commerce

Commander (DRM)
Attn: LT James Nunez
17th Coast Guard District
PO Box 25517
Juneau, AK 99802-5517

Alaska Wilderness
Recreation & Tourism
Association

Chugach Alaska
Corporation

Re: Revision to 1989 Oil Dispersant Guidelines

City of Cordova

Dear Lieutenant Nunez:

City of Homer

As you are aware, the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation whose mission is to promote environmentally safe operation of the Valdez Marine Terminal (VMT) and associated tankers. Our work is guided by the Oil Pollution Act of 1990 and our contract with Alyeska Pipeline Service Company (APSC). PWSRCAC's 19 member organizations are communities in the region affected by the 1989 Exxon Valdez oil spill, as well as commercial fishing, aquaculture, Native, recreation, tourism and environmental groups. PWSRCAC has prepared these comments on the Alaska Regional Response Team's (ARRT) draft revision to Annex F, Appendix I of the Unified Plan, entitled "Alaska Regional Response Team Oil Dispersant Authorization Plan" dated September 25, 2013.

City of Kodiak

City of Seldovia

City of Seward

City of Valdez

City of Whittier

Community of
Chenega Bay

Community of
Tatitlek

Dispersant use decision-making is an issue of significant concern to PWSRCAC, and we appreciate the opportunity to provide comments on the draft document.

Cordova District
Fishermen United

Kenai Peninsula
Borough

GENERAL COMMENTS

Kodiak Island
Borough

PWSRCAC largely considers the Dispersant Use Authorization Plan as an improvement over the current guidelines, and appreciates the efforts of those tasked with improving these guidelines. PWSRCAC recognizes the considerable time and attention that has been put into this effort.

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

Port Graham
Corporation

Prince William Sound
Aquaculture
Corporation

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PWSRCAC Dispersant Use Position

PWSRCAC does not support the use of chemical dispersants because their effectiveness in low temperature and seasonably low salinity Alaska waters has not been definitively substantiated. Any perceived environmental benefit of dispersant use is outweighed by the long and short term toxicity impacts of dispersants combined with oil to key Alaskan marine species and habitats. Additionally, dispersant application is resource intensive from a planning standpoint, and may interfere with mechanical recovery, which remains the preferred oil spill response methodology under both state and national oil spill response policy.

Importance of Science-Based Policy for Alaska

A full scientific review should be completed prior to finalizing these guidelines, and appropriate scientific studies should be referenced in the document. The best available science for Alaska-specific ecosystem dynamics should be referenced and incorporated into the revised guidance document. PWSRCAC strongly recommends that a full scientific review of the revised dispersant use policy be conducted by outside entities (such as the National Research Council) and that updated scientific evidence regarding the impacts of dispersants be included and referenced in the final guidelines. We continue to offer our extensive dispersants research literature synthesis and database (updated annually, currently to 2013) as provided previously to the Science and Technology Committee at that committee's request (<http://www.pwsrcac.org/programs/environmental-monitoring/dispersants/dispersant-literature-reviews/>). Appropriate scientific references on the impacts of dispersant use should be incorporated into the process of finalizing the Preauthorization Area, to ensure that dispersant use is prohibited in areas where its impacts could cause more harm than benefit.

Status of SMART Protocols

PWSRCAC understands that the SMART protocols are currently being updated. Ideally, the updated protocols would be available for review alongside the draft Alaska dispersant use guidelines, since SMART monitoring is a key factor in evaluating both dispersant effectiveness and in estimating subsurface dispersed oil concentrations, trajectories, and associated toxicities. If the timing of these two processes does not align, PWSRCAC recommends that the ARRT consider the need to re-evaluate and potentially revise the Alaska guidelines for conformance with the SMART revisions.

We also suggest that the ARRT consider the need to provide for enhanced monitoring in Alaska, and specifically the importance of monitoring ecological impacts from dispersant use, which are currently not addressed in the SMART protocols. PWSRCAC currently has a project underway to develop enhanced dispersants use monitoring protocols that will incorporate the idea of

monitoring activities into the pre-application timeframe in order to gather information about existing biota in an area in an effort to determine what biological resources might be impacted by the application. We will offer these protocols to the ARRT for use upon completion. The ongoing revisions to Alaska's dispersant policy provides an opportunity for Alaska to set the standard for biological impacts monitoring as a key component to evaluating dispersant effects.

COMMENTS ON "Oil Dispersant Authorization Plan, Revision 1"

Title

The title of the document, "Oil Dispersant Authorization Plan," does not reflect the document's contents or purpose. In the current version of the Unified Plan, Appendix I to Annex F is entitled "Oil Dispersant Guidelines for Alaska." The new title, which includes "Authorization," suggests across-the-board authorization and is not consistent with statements in the body of the document that affirm that dispersants are an alternative response technology that should only be used when mechanical recovery is not feasible or not effective. Dispersants do not remove oil from the environment, and should only be considered for situations where mechanical recovery would not be safe, feasible, or effective. The emphasis on preauthorization is not consistent with established policy or practices in Alaska.

PWSRCAC recommends that the ARRT revise the title of Annex F, Appendix I to emphasize that the document provides guidance for dispersant use decision-making rather than blanket preauthorization. We suggest retaining the previous title "Oil Dispersant Guidelines for Alaska."

1.0 Background and Overview

Footnote 2 indicates that there will no longer be any Preauthorization areas inside Prince William Sound or Cook Inlet.

PWSRCAC supports this change, but we have reservations about the scope and size of the preauthorization area, which are discussed later in these comments.

Figure 1 shows a conceptual model for spill response decision-making. The first decision point for using dispersants or in-situ burning is based on feasibility. It is unclear how feasibility would be determined.

PWSRCAC recommends that the ARRT clarify in Figure 1 the criteria and process used to assess feasibility and indicates who makes this assessment.

There are two boxes in the flow chart that discuss impacts. PWSRCAC recommended in previous comments that the word "ecosystem" be added to this text.

PWSRCAC restates our previous recommendation to edit Figure 1 so that the text reads "Are ecosystem impacts associated with..." in the boxes for dispersant and in-situ burning approval decisions.

At the bottom of the flow chart in Figure 1, dispersant use field test approval is identified as an FOSC decision. This is the first of many instances where the revised document provides significant autonomy to the FOSC. (For example, the first paragraph on pg. F-7, second bullet on pg. F-8). By comparison, the existing Dispersant Use Guidelines require approval from the State of Alaska and the Environmental Protection Agency (EPA) prior to approving dispersant use. It is not clear why the FOSC's autonomy has been strengthened and the decision-making authority of EPA and the State of Alaska reduced.

PWSRCAC recommends that the State of Alaska and EPA retain their current authority to approve or disapprove dispersant use decisions.

Section 1.3 describes the preauthorization process specified in the National Contingency Plan (NCP), noting that approval from the EPA, DOI, DOC, and the state is required for preauthorization. The area in which dispersant use is preauthorized (as shown in Figure 2) is quite expansive and encompasses large areas of commercially important fish species. Some of the areas provide critical habitat or feeding areas for fish, birds, and mammals, including threatened and endangered species. It is not clear whether trustee agency approval has already been secured for this large area, but it would make sense to ensure that they are in agreement with the preauthorization area before the revised dispersant guidelines are finalized. Additionally, as the proposed pre-approval area is offshore in federal waters, the state's role and agreement to the proposed preauthorization is unclear.

PWSRCAC recommends that the ARRT clarify whether EPA, DOI, DOC, and the State of Alaska approve the preauthorization area as depicted in Figure 2 of the draft revisions to Annex F, Appendix I. Further, as any oil spill response activities in these offshore federal waters would result in near certain impacts to adjacent state waters and fisheries, the PWSRCAC recommends the state's agreement to and concurrence with the proposed dispersant guidelines and dispersant use preauthorization area be explicitly required as a condition of their implementation.

The first bullet on page F-8 indicates that the FOSC would seek concurrence from trustee agencies for use of dispersants outside a preauthorization area "when practicable." The criteria for practicability are not specified.

PWSRCAC recommends that the document provide clear guidelines for determining whether consultations are practicable to establish a consistent framework for making these types of subjective evaluations.

The second bullet on page F-8 discusses situations when “the use of the product is necessary to prevent or substantially reduce a hazard to human life” as another situation where the FOOSC’s discretionary authority is quite broad. Given the extensive history of published suspected human health impacts to oil spill responders exposed to various dispersants all the way back to the Exxon Valdez Oil Spill in 1989, it is difficult for us to imagine a scenario where dispersant use would prevent or substantially reduce a hazard to human life or where an FOOSC would be in a position to make that medical human health benefit determination.

PWSRCAC recommends that the document provide specific examples of the types of situations envisioned by this statement.

The last paragraph in the Preauthorization section (third paragraph on page F-10) describes the process for re-designating locations within the Preauthorization Area. Local stakeholders are provided an opportunity to delineate avoidance areas within the Preauthorization Areas, and those areas would subsequently be reclassified as Undesignated, requiring case-by-case approval for dispersant use. PWSRCAC supports this approach; however, the draft guidelines document does not provide a clear mechanism or pathway for undertaking these reviews. Further clarification is needed to define avoidance areas in Subarea Contingency Plans.

PWSRCAC recommends that the ARRT provide a more detailed description of the process and timeline that will be applied to the reclassification process. Specifically, we suggest the following:

- *Provide a timeline and structure to ensure that the requisite review of Preauthorization Areas is completed statewide within the 24-month timeframe.*
- *Clarify how the Preauthorization Area will be treated during the initial 24-months, when review is ongoing. We recommend applying case-by-case approval during the 24-month time period when the Preauthorization Area is under review.*
- *Once an area has been classified, develop a process and timeline for periodic review of that classification to determine if changes may be needed.*

Note that PWSRCAC is well positioned to facilitate the review of Preauthorization Areas in the Prince William Sound, Kodiak, and Cook Inlet Subareas. We have established relationships with key stakeholders, trustee agencies, and natural resource experts in these three regions.

Page F-10 describes the designation of Dispersant Use Avoidance Areas, but the draft document seems to suggest that dispersants could still be approved for use in these areas on a case-by-case basis. PWSRCAC believes that there are some areas where dispersants use is never appropriate, and that these areas should be designated ahead of time to facilitate response decision-making.

PWSRCAC recommends that the guidelines provide a non-time-limited mechanism to designate certain areas both within the currently proposed pre-approval area and in currently un-designated areas as off-limits to dispersant use without condition. Not only would this protect areas that are particularly sensitive to dispersants or dispersed oil, it would save time and deliberation during a spill response for places where dispersants are extremely unlikely to ever be approved.

2.0 Dispersant Use Policies, Criteria, and Conditions/Stipulations

Section 2.1 contains a list of policy statements regarding dispersant use. Many of the statements are very broad or non-specific. For certain statements, it would be useful to point to other areas of the document where the process for making specific determinations is outlined. For example:

- Bullet 6 states “All input related to dispersant use authorization will be provided to the FOSC within the timeframe requested by the FOSC. The FOSC will provide sufficient time for that input.” This statement raises several questions:
 - From whom is the input being requested?
 - How will “sufficient time” be measured?
- Bullet 7 states that pre-authorization only applies to crude oil.
 - Are bitumen (tar sands) products included in this category? They have been technically classified as crude oils in many instances, but the preliminary science shows that dispersants are not effective on these bitumen blends.¹
- Bullet 8 indicates that the evaluation of trade-offs and the basis of decision-making will be documented.
 - Who, or what entities, will be evaluating the trade-offs?
 - Will this documentation be available to the public?
- Bullet 9 reads, “One or more dispersant application field tests to determine the effectiveness of oil dispersion under existing site-specific environmental

¹ PWSRCAC interest in Bitumen stems from interest expressed by Canadian provincial officials to ship Alberta oil, including tar sands oil, to Alaska to be inserted into the Trans-Alaska Pipeline System (TAPS), (AK Journal of Commerce: July 18, 2013). Additionally, in 2012 and 2013 there has been an increase in TAPS shippers bringing oil back into PWS and Cook Inlet without disclosing the origin or nature of that crude leaving open the possibility of a TAPS-related Bitumen spill in Alaskan waters.

conditions will be conducted. The resulting information will be analyzed to determine whether full-scale dispersant application(s) will begin.”

- What type of information will be collected?
- How and by whom will it be analyzed?
- Are there guidelines/parameters for acceptable results from these types of tests?
- Will the resulting information and analysis be made available to the public or part of the after action report?
- Bullets 5, 10 and footnote 9 are redundant.
- Bullet 11 discusses operational feasibility, but no framework is provided for how this will be assessed.
- Bullet 12 assigns the FOSC with responsibility for ensuring that “all required monitoring” is carried out.
 - What are the specific monitoring requirements?
 - Ecological effects monitoring should be required.
 - All monitoring efforts should be fully documented and made available to the public.

PWSRCAC suggests that amplifying information be included or referenced in the Policy section to provide clarity regarding expectations and assignments.

- *Indicate the individuals who would be providing input, and provide some general guidelines for “sufficient time” (one hour, one day, etc.) in Bullet 6. Input and participants in the process should be summarized and included in the after action report and made available to the public.*
- *Clarify whether tar sands oils are considered crude oil for the purpose of these guidelines in Bullet 7.*
- *Indicate who has decision-making authority to evaluate trade-offs in Bullet 8 and analyze field test data in Bullet 9. Evaluation of trade-offs and analysis of field test data and participants in the process should be summarized and included in the after-action report and made available to the public.*
- *Identify the documentation requirement for decision-making in Bullet 8.*
- *Indicate the types of information that will be collected to evaluate effectiveness during field tests and the parameters (SMART?) that would be applied to characterize a field test as “effective.” (Bullet 9).*
- *Consolidate Bullets 5 and 10.*
- *Provide guidance on factors that are used to evaluate operational feasibility (i.e., visibility/ceiling, limits to available equipment, etc.?) See our recommendation on RMROL under comments on Sections 2.2 and 2.3.*
- *Specify required monitoring (Bullet 12). Include a requirement for ecological effects monitoring.*

Section 2.2 presents criteria for dispersant use decision-making, and Section 2.3 identifies conditions and stipulations for dispersant use. PWSRCAC supports the idea of establishing well-defined criteria to guide dispersant use decision-making. However, the information as presented in the draft guidelines is

scattered through these two sections and mixes quantitative and qualitative measures. The list of criteria is not exhaustive, and should include additional parameters that are not presently discussed in the draft guidelines. It also mixes environmental and logistical considerations. Specific, measurable criteria will facilitate the dispersant use decision-making process by providing rules-of-thumb to rule out or rule in dispersants as a possible response tool. It would be useful to have a consolidated reference for these limits and criteria, and wherever possible, to provide more specificity, particularly regarding the considerations that should be used for case-by-case determinations. The more discretionary the criteria, the more difficult they will be to consistently apply.

We also found several instances where limits presented or discussed in the text differ from those presented in checklists and decision-making tools included in Tab 1. It is important that the final document align.

PWSRCAC reviewed the criteria presented in Sections 2.2 and 2.3, and offers the following observations and recommendations.

Section 2.2 Criteria:

- **Bathymetry:** Dispersant use is limited to water depths of 60 feet or deeper. This is a clearly stated quantitative limit.
- **Distance from shore:** An “adequate buffer” must be established. This is a qualitative assessment subject to interpretation.
 - *PWSRCAC suggests including a minimum distance from shore based on input from resource trustees.*
- **Wind and currents:** A maximum wind speed is presented (26.8 – 31.3 mph), but currents are not discussed. The need for minimum wind speeds to ensure sufficient mixing energy is not discussed.
 - *PWSRCAC suggests providing upper and lower limits to wind speeds and adding a discussion of mixing energy. The relevance of currents to dispersant decision-making should be included.*
- **Salinity:** Minimum salinity of 15 parts per thousand is established. This is a clearly stated quantitative limit.
- **Temperature:** Temperature is discussed in qualitative terms.
 - *PWSRCAC suggests providing minimum water temperature requirements for dispersant application.*
- **Weather and sea conditions:** These are not included in the criteria section, but visibility, wind, ceiling, and sea state conditions are discussed in the FOOSC checklist in Tab 1, Part 4.
 - *PWSRCAC recommends a thorough consistency review to ensure that all criteria included in the authorization checklists are discussed and, when possible, quantified in the guideline document.*
- **Response equipment:** Equipment availability and mobilization time are discussed in general terms. Unlike the previous considerations which focus on environmental conditions, this is more of a planning/logistical factor.

- *PWSRCAC suggests categorizing the dispersant use criteria. For response equipment, additional information about windows-of-opportunity for dispersant use should be included to inform the assessment of whether equipment availability is sufficient.*
- **Sensitive habitats:** A qualitative discussion of sensitive habitats indicates that certain habitats may be adversely impacted by dispersant use.
 - *PWSRCAC recommends providing more definitive rules-of-thumb for the types of habitats where dispersant use should not be permitted (i.e. nursery, endangered species critical habitat).*
- **Sensitive species:** A qualitative statement is made.
 - *PWSRCAC recommends making a stronger statement about dispersant use limitations in relation to threatened and endangered species. This could be addressed during the Section 7 ESA consultation in this draft document.*
- **Other special use areas:** These are described in general terms.
 - *PWSRCAC recommends that the preauthorization review process consider whether certain special use areas be designated as Dispersant Avoidance Areas, and that those be captured in the guidance document.*
- **Historic properties:** These are described in general terms.
 - *PWSRCAC suggests that the ARRT develop a minimum safe distance to buffer historic properties from potential adverse impacts from dispersant use.*
- **Human use activities:** These are described in general terms.
 - *PWSRCAC suggests that the ARRT develop a minimum safe distance to buffer human use areas from potential adverse impacts from dispersant use.*
- **Public and private facilities:** These are described in general terms.
 - *PWSRCAC suggests that the ARRT develop a minimum safe distance to buffer public and private facilities from potential adverse impacts from dispersant use.*

Section 2.3 Conditions/Stipulations

- **Field tests** are required on a “representative portion” of the oil slick.
 - *PWSRCAC recommends that parameters be provided for evaluating whether a portion of the slick is “representative.”*
- **Effectiveness and tradeoffs** reference Tab 1.
- **Daylight** is a requirement for all dispersant applications. This is a clear requirement.
- The 4th bullet restates the Criteria for minimum water depth and distance from shore.
 - *PWSRCAC recommends consolidating these.*
- **Minimum distance from swarming fish, rafting birds, or marine mammals** (1640 feet) is established. While this is a clear, quantitative standard, it may be extremely difficult to implement, given the fact that wildlife may move in

fast and unexpected ways. The collection and transmission of this information cannot be left to chance.

- *PWSRCAC recommends specifying resource wildlife trustee agencies and in-the-field spotters or observers be identified to provide the expertise necessary for the use requested. Agencies should review these limits and provide additional guidance prior to their implementation.*
- **Walrus haul-outs** are given special consideration.
 - *PWSRCAC recommends that wildlife trustee agencies consider whether there are other areas, such as sea lion haul outs, that should be given consideration.*
- **Atypical dispersant use** (subsea application or prolonged application beyond 96 hours) is discussed, and special monitoring required.
 - *PWSRCAC suggests that atypical dispersant use is not appropriate in Alaska and should not be accommodated under these guidelines.*

Many of the criteria considered in Sections 2.2 and 2.3 relate to operating limits for dispersant application. The concept of Realistic Maximum Response Operating Limits (RMROL) is well developed in Alaska regulations, and should be incorporated into the dispersant use guidelines. The operational limits for dispersant use should be clearly stated and should form the basis for assessment of operational feasibility.

PWSRCAC recommends adding a section on RMROL identifying specific operational limits for dispersant use to inform the question of “feasibility.”

Finally, it is not entirely clear which of the criteria described in Section 2.2 and 2.3 apply to preauthorization areas, which apply in case-by-case evaluations, and which apply in both. For example, a non-crude oil spill would presumably not qualify for preauthorization, even if the spill occurs within the preauthorization area. This should be clearly stated. For limits that are tied to geographic location (such as water depth), it would be logical to change those areas to Dispersant Use Avoidance Areas.

PWSRCAC suggests a reorganization of Sections 2.2 and 2.3 to provide a clear reference for all limits that should apply to dispersant use decision-making. Wherever possible, objective and measurable criteria should be identified.

Tab 1. Process for Dispersant Use Authorization

Part 1A summarizes the process for dispersant use in Preauthorization Areas. With the exception of crude oil, no other factors are discussed as being required in order for dispersant preauthorization to be applied.

PWSRCAC suggests including a step early in the checklist that prompts the FOOSC to consider whether other parameters may apply that negate the preauthorization (i.e., non-daylight hours, temperature or salinity parameters not met, etc.).

Step 13 refers to State of Alaska participation “when appropriate.”

PWSRCAC recommends that the State have a more definitive role in dispersant use decision-making, regardless of whether the use of dispersants would occur in federal or state waters, since every spill (including offshore spills) has the potential to impact state waters.

Step 15 describes the after-action report requirement.

PWSRCAC recommends that the After-Action Report completed include documentation of all dispersant use decision-making, including completed checklists. Completed checklists should be made available to the public.

Part 1B summarizes the process for case-by-case dispersants use authorization. The final bullet under Step 2 refers to FOOSC notification of “appropriate stakeholder groups” when dispersants may be used. However, it is not entirely clear which stakeholder groups would be provided with an opportunity to participate, and it is not clear how stakeholder input will be addressed in decision-making.

PWSRCAC recommends adding information to describe how stakeholder groups will be identified for inclusion in the process, and whether this would be done ad hoc during a spill response, or whether there would be standing groups established for each Subarea. PWSRCAC would advocate for the latter approach, with an opportunity to include additional stakeholder groups into the standing organization based on spill specifics. This process could be initiated as part of the effort to identify avoidance areas within each Subarea's Preauthorization Area. We also recommend that the guidelines provide more detail about how stakeholder input will be incorporated into dispersant use decision-making.

Tab 1, Part 2: Dispersant Use Request contains a form to initiate potential dispersant use. It includes (pg F-22) wildlife information that identifies the type and estimated number of fish, birds, and marine mammals observed “near the oil slick.” It is not clear how this relates to the criteria for a minimum 1640 ft distance. It is also not clear what the process is for identifying and monitoring wildlife.

PWSRCAC recommends aligning the Dispersant Use forms with the guidance presented in the document.

SMART Protocol

A copy of the SMART monitoring protocol was included as an attachment to the draft dispersant guidelines. Implementation of SMART monitoring protocol is a requirement for dispersant use, which aligns with national policy. However, it is our understanding that certain aspects of the SMART protocol are under review and revision.

PWSRCAC recommends that the ARRT ensure that the Alaska guidelines are consistent with any changes or additions to the SMART protocol.

While the SMART protocol provides a consistent system for evaluating dispersant effectiveness, it does not address toxicity or ecological impacts, which should be an important consideration for dispersant use decision-making. PWSRCAC has longstanding concerns regarding dispersant toxicity and the limits to toxicological assessments that are done under Subpart J of the National Contingency Plan. The toxicological studies that underlie dispersant chemical approval rely on species that are not representative of Alaska marine waters and do not adequately consider sub lethal effects. It does not appear that adverse human health impacts have been adequately evaluated.

CONCLUSION

PWSRCAC supports the concept of updating the dispersant use guidelines, and we recognize many improvements in the 2013 draft. However, there are areas where the draft guidelines need more work, particularly with respect to the following:

- The 2013 draft emphasizes preauthorization in a manner that is potentially misleading. Mechanical recovery remains the preferred response option in Alaska, and dispersants should be considered for use only when mechanical recovery is not possible. Even within the preauthorization area, dispersants should be used as a last resort and only when specific conditions are met (adequate mixing energy, dispersible oil type, daylight, adequate distance from or absence of subsurface or surface marine species, etc.).
- Decision-making criteria are presented as a mix of qualitative and quantitative parameters, and should be more clearly delineated and linked to checklists and decision aids.
- The 2013 draft provides significant autonomy to the FOSC, and minimizes the opportunity for input from trustee agencies and the State of Alaska.
- The process for stakeholder input and review of dispersant use decisions and re-designation of preauthorization areas is unclear.

The PWSRCAC appreciates the opportunity to provide comments on Annex F, Appendix I proposed dispersant usage guidelines revisions for the ARRT. We welcome the opportunity to answer any questions, further discuss, or provide

additional clarification to any of the attached comments as arise either from the ARRT or from any of the individual resource trustees or member agencies.

Sincerely,



Mark A. Swanson,
Executive Director

Cc: Mark Everett, Co-Chair, US Coast Guard
Chris Fields, Co-Chair, EPA
Kristin J. Ryan, ADEC
Sam Carlson, USDA
Doug Helton, NOAA
Bill Zagrocki, DOD
Diane Clark, DOE
Joe Sarcone, DHHS
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