



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

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March 31, 2004

MEMBERS

Alaska State
Chamber of
Commerce

US Department of the Interior
Minerals Management Service
381 Elden Street
Herndon, VA 20170-4817

Alaska Wilderness
Recreation & Tourism
Association

Subject: Letter in Support of the development of an All-Purpose Oil Spill Response Vessel; MMS Solicitation # 1435-01-04-RP-33212

Chugach Alaska
Corporation

Greetings;

City of Cordova

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) is an independent non-profit corporation formed after the 1989 *Exxon Valdez* oil spill to promote environmentally safe operation of the Valdez Marine Terminal and associated tankers. Our work is guided by the Oil Pollution Act of 1990 and our contract with Alyeska Pipeline Service Company. Our 18 member organizations are communities in the region affected by the Valdez spill, as well as commercial fishing, aquaculture, Native, recreation, tourism and environmental groups.

City of Homer

City of Kodiak

City of Seldovia

City of Seward

The Oil Pollution Act of 1990 mandates the PWSRCAC to monitor, review and assess oil spill response technology developments. In turn, the PWSRCAC Oil Spill Prevention and Response (OSPR) technical committee is tasked with investigating the combination of technologies appropriate to our region. Through its monthly meetings, OSPR has been closely following the developments of the All-Purpose Oil Spill Response Vessel (AP OSRV) design recently submitted by BMT Designers & Planners, Inc. and Avis Marine Consulting in response to the Minerals Management Services (MMS) solicitation number 1435-01-04-RP-33212.

City of Valdez

City of Whittier

Community of
Chenega Bay

Community of
Tatitlek

PWSRCAC also routinely reviews contingency plans for the Valdez Marine Terminal and Prince William Sound crude oil carriers and advocates for the highest standards. Alyeska Pipeline Service Company/SERVS, Prince William Sound crude oil shippers, the Alaska Department of Environmental Conservation and the U.S. Coast Guard all deserve recognition for creating a world-class response capability in Prince William Sound. However, gaps remain in current oil spill prevention and response capabilities in Prince William Sound and worldwide. The oil industry's contingency plans for Prince William Sound specify that cleanup is possible only if winds are less than 30 knots (about 35mph) and wave height is less than ten feet. There is considerable controversy over how realistic these equipment limitations are at 30 knot sustained winds and ten foot seas. These response limits are lowered even further in the unprotected Gulf of Alaska. Tankers, however, are allowed to sail when the sustained wind is under 45 knots (about 52mph) or wave height is less than 15 feet, and the weather can deteriorate from these severe conditions potentially creating an even larger response gap. Therefore, there is a need to develop an affordable method of oil spill response that is versatile enough to be effective in both calm and high sea state conditions.

Cordova District
Fishermen United

Kenai Peninsula
Borough

Kodiak Island
Borough

Kodiak Village Mayors
Association

Oil Spill Region
Environmental
Coalition

Prince William Sound
Aquaculture
Corporation

In Prince William Sound there is a confined area within the tanker lanes that is plagued by icebergs generated by the Columbia Glacier which contributed to the grounding of the *Exxon Valdez* in 1989. Our extensive studies of the glacier show that this problem will most likely increase in future years with the potential for seriously impeding spill response in the area. Strong winter winds can generate strong surface currents that could create additional spill response challenges. Exclusion of oil from several of our most sensitive environmental resources may be difficult if not impossible due to high currents, broken ice or high seas generated by frequent and long lasting storms. Conditions worldwide present similar response gaps with a wide range of weather and physical environments such as broken ice, constricted waterways and water depth constraints.

Mechanical recovery is mandated to be the primary response tool for oil spill response by the State of Alaska, and PWSRCAC endorses this. If mechanical response proves ineffective, non-mechanical actions, such as chemical dispersants or in situ burning, may be implemented. It is not uncommon for the varying weather and sea conditions that prohibit mechanical recovery to also prohibit the use of the current non-mechanical response methods. In addition, there is much controversy over the effectiveness and long and short-term toxicity of current non-mechanical response options. Thus, the need to develop methods of mechanical recovery versatile enough to be effective in open ocean high sea states, broken ice and other varying weather conditions and bathymetry is of paramount importance.

The proposed AP OSRV design attempts to address a wide range of physical environments and weather conditions that present the most challenging problems for oil spill response worldwide. After initial review of the AP OSRV concept and proposed objectives, the PWSRCAC Board of Directors believes this technology is appropriate for further research efforts. PWSRCAC is hopeful the R&D funding will be established through federal grants to complete Phase I of the concepts scope and we request that MMS take this into serious consideration. Although this project was brought to our attention too late for inclusion in our budget this year, the PWSRCAC will consider contributing to the funding of subsequent phases of the AP OSRV project if it shows significant promise of substantially improving mitigation of spills in our problematic conditions. We also intend to support funding from other agencies and organizations with a mandate or interest in development of more effective oil spill mitigation.

Thank you for your consideration of this request. Please feel free to contact Project Manager Joe Banta at (907) 273-6222 if you have any questions.

Sincerely,



John S. Devens, Ph.D.
Executive Director

cc: Carl Schoch, Oil Spill Recovery Institute
Richard Ranger, Alyeska Pipeline Service Company
CDR Mark Swanson, U.S. Coast Guard MSO Valdez
Commissioner Ernesta Ballard, Alaska Department of Environmental Conservation
Tom Colby, Response Planning Group/ATC