

August 6, 2021

Allison Natcher
Interagency Coordination Unit Manager
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

RE: Comments on the Alaska Regional Contingency Plan Public Review Draft, June 2021

Dear Ms. Natcher,

I am writing to express a concern to changes in the Alaska Regional Contingency Plan that would allow for a Multiagency Coordinator Group (MAC) or Regional Stakeholder Committee (RSC). The RSC has been a successful model that works in Alaska. The MAC may make sense in other areas of the US, such as the Gulf Coast where agencies and industry have a robust response capability; however, this is not the case in Alaska. As a social scientist who has researched the impacts of the Exxon Valdez oil spill on local communities for almost 20 years, I have found the importance of including voices from communities, fishing associations, Tribes, and community groups into planning and response to technological disasters.

Over the past few years, I've had the privilege to participate in oil spill planning discussions hosted by the National Academies Gulf Research Program. We recently conducted an oil spill simulation gaming exercise which helped me understand the differences in response capabilities and coordination in Alaska versus the Gulf Coast. Having spent some time on the Gulf Coast working with my colleagues in other Sea Grant programs, I've learned of the footprint the industry has in this region and the capabilities for response. I held a workshop in Anchorage in 2019 on the social, economic, and health impacts of oil spills on communities. In the Alaska workshop we heard clearly on the need to involve stakeholders in outreach and communications and include them in response planning as they will most likely be the first responders to a technological disaster due to the limited response capabilities in Alaska. I also serve as Chair of the Prince William Sound Regional Citizens' Advisory Council's Scientific Advisory Committee, through which I contribute expertise and stay informed on a range of issues related to oil transportation activities in Prince William Sound and Alaska. From all these activities I have learned that in Alaska, the capabilities of the industry to respond are not as robust as in other regions of the country. Communities in Alaska rely heavily on wild resources for their way of life and impacts from spills have a detrimental impact to both subsistence and commercial activities. Communities, Tribes, and fishing associations need to have a stated role in contingency plans and the response to a spill. The RSC process allows for this.

While the MAC concept has similarities to the RSC, on closer examination the two clearly serve different purposes. The RSC approach evolved in Alaska to provide more formal structure and a clear mechanism to engage affected stakeholders. In fact, it was originally determined by industry and the state to be a better fit for Alaska than the MAC. Alaskans need a clearly defined mechanism by which to communicate with decision-makers during a response, which the RSC provides. The RSC has a defined process for diverse groups to engage, already practiced in large spill response exercises with job aids and other support

materials currently in place. If the proposed changes move forward, it could create confusion and inconsistency, or even reduce or eliminate input from affected Alaskans.

Sincerely,

Davin Holen

Dr. Davin Holen
Assistant Professor and Coastal Community Resilience Specialist
Alaska Sea Grant
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