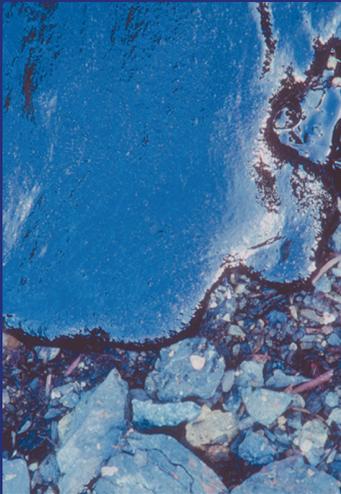




American
Petroleum
Institute

NRT



Department of Homeland Security
United States Coast Guard
California SONS 04

After Action Report

10 September 2004



California SONS 2004 Sponsors' Message

The *California Spill of National Significance (SONS) 2004 Exercise After Action Report* was prepared jointly by ChevronTexaco and ConocoPhillips, representing the American Petroleum Institute SONS Consortium; the California Office of Oil Spill Prevention and Response; and the U.S. Coast Guard, Department of Homeland Security.

The report summarizes the largest National Response System exercise in our nation's history. The exercise produced a number of historic "firsts," such as the full participation and integration of the Government of Mexico into the response management organization, the activation of the Initial National Response Plan, and the execution of a full-scale 3-day 24-hour, real-time SONS exercise. Over 2,200 people participated from government and industry. Field-level Unified Commands operated from large command posts in Ensenada, Mexico, and San Diego and Los Angeles, California. A National Incident Command post in Los Alamitos, California coordinated and supported the activities of the field-level Unified Commands and communicated with regional- and national-level stakeholders. The National Response Team and Interagency Incident Management Group also stood up to support the operations. In addition to the exercise, an Executive Seminar was held in Washington DC, gathering senior government and industry officials together to discuss political, security, economic, and environmental issues related to a SONS incident.

An effective exercise is measured by its ability to achieve its stated objectives and to serve as a realistic platform from which participants can practice their skills and gain a greater experience. The California SONS 2004 exercise was highly successful by both measures, attributable to the top performance of the exercise planners and participants. The lessons learned from this exercise will help our nation be better prepared for a large-scale incident response.



A blue ink signature of Thomas H. Gilmour, written in a cursive style.

RADM Thomas H. Gilmour
Assistant Commandant for Marine Safety, Security and
Environmental Protection, United States Coast Guard



A blue ink signature of Carlton Moore, written in a cursive style.

Carlton Moore
Administrator, State of California, Department of Fish
and Game, Office of Spill Prevention and Response



A blue ink signature of Alex Walker, written in a cursive style.

Alex Walker
Industry Representative for the American Petroleum Institute
SONS Consortium, Vice President and General Manager
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EXECUTIVE SUMMARY

To ensure the readiness of personnel to respond to emergency situations, the U.S. Coast Guard (USCG) conducts regular preparedness exercises both internally and in partnership with other federal government agencies, state and local agencies, industry, and volunteer organizations. The California Spill of National Significance (SONS) 2004 exercise was sponsored by the USCG, the California Office of Spill Prevention and Response, and the American Petroleum Institute SONS Consortium. It utilized the USCG's National Incident Command (NIC) organization and involved four levels of exercise play: field-, regional-, national-, and international-level exercise components. The exercise also included an Executive Seminar designed to bring senior agency and industry representatives together to discuss national level issues related to large-scale responses. Following exercise play, issues and gaps during the response were identified and discussed during hotwash forums at each level of play.

California SONS 2004 was the fourth SONS exercise under the USCG SONS exercise program, and was conducted 20-22 April, 2004 in Los Angeles/Long Beach, CA; San Diego, CA; Los Alamitos, CA; Washington, DC; and Ensenada, Mexico. This exercise involved over 2,200 participants representing 141 organizations. California SONS 2004 was the largest SONS exercise, the largest National Response System (NRS) exercise, and the first international SONS. One of the most critical command and control elements of the tiered response management system used during a SONS is to ensure a "common situational picture" existed at all organizational levels. California SONS 2004 tested this system to ensure that program managers and senior government officials, particularly at the national level, were clearly articulating their information requirements to all levels of the response organization, thereby ensuring that the situational information developed within the various command posts incorporated these requirements.

The major objectives of California SONS 2004 were:

- Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.
- Assess the viability and compatibility of all plans appropriate to support a SONS response.
- Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.

- Evaluate the ability of the Unified Command to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.
- Exercise any policy, organizational restructuring, and/or new regulatory requirements (e.g., Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.
- Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan (also known as the Pacific Annex of the *Joint Contingency Plan between the United Mexican States and the U.S. Regarding Pollution of the Marine Environment by Discharges of Hydrocarbons or other Hazardous Substances*).

This After Action Report presents the major issues that have NRS implications and is intended to drive improvements to the national prevention, preparedness, and response systems. The U.S. Coast Guard, in coordination with the NRS organizations, has committed to resolving these issues in fiscal year 2005, prior to the planning for the 2007 SONS exercise. The report does not contain regional, local, or agency specific issues and recommendations. The issues portion of this report is organized into sections according to the National Fire Protection Association standard on Disaster/Emergency Management and Business Continuity Programs to help organize policies, plans, and procedures into a logical framework and across organizational boundaries. This report lists the recommended corrective actions for each issue identified during the exercise. These recommendations were developed by the SONS planning and coordination team with representation from the sponsoring organizations. The following is a list of the NRS issues raised during the SONS exercise:

- Jones Act Clarification
- Expedited Cross Border Exchange of Response Resources
- Cross Border Waste Disposal
- Cross Border Wildlife
- Information Management
- Incident Management Applications
- NIC Planning and Operations
- Dispersant Procedures
- Clarification on Roles and Responsibilities in the National Response Plan
- Area Contingency Plan Shortfalls for Emergency Operations
- Update the Incident Management Handbook and National Response Plan
- Port of Safe Refuge in the International Maritime Organization Guidelines
- Interagency Incident Management Group/National Response Team Coordination
- Interactions Between the NIC and Principal Federal Official Staffs
- National Response Center and National Response Team Notification and Information Sharing
- Salvage Capabilities
- Dispersant Use Decision

- Incident Command System Training
- Knowledge on Salvage and Cleanup Operations
- Funding of a SONS
- Multiple Financial Tracking Systems
- Funding Sources for International Response Operations.

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2

EXERCISE OVERVIEW

2.1 Overview

The U.S. Coast Guard (USCG), California Office of Spill Prevention and Response (OSPR), and the American Petroleum Institute (API) Spill of National Significance (SONS) Consortium sponsored the California SONS 2004 exercise (hereby referred to as SONS 04), to improve the preparedness of the entire response organization from the port level to agency heads in Washington, DC.

This exercise—conducted on 20-22 April, 2004 in 5 cities—was the fourth SONS exercise carried out under the USCG SONS exercise program and involved over 2,200 participants from over 140 organizations. (See Appendix 1 for a list of participating organizations.) SONS 04 was the largest National Response System (NRS) exercise conducted to date and was the first exercise to test the Initial National Response Plan and the National Incident Management System (INRP & NIMS). In addition, it was the first international SONS, as well as the first with the API SONS Consortium participation as the fictitious responsible party, which was named Keydet Energy for this scenario.

The SONS 04 exercise was an operations-based (or full-field) exercise that simulated two major maritime incidents off the coast of Southern California, requiring an intense and massive response by local, state, and federal agencies, the Government of Mexico (GOM), industry and volunteer organizations. It utilized the USCG's National Incident Command (NIC) organization and involved four levels of exercise play:

- **Field-level Exercise**—A field deployment exercise that involved the mobilization of personnel and resources at the Ports of Los Angeles/Long Beach (LA/LB) and San Diego and tested local plans.
- **Regional-level NIC Command Post Exercise**—A command post exercise located at Los Alamitos that tested regional plans as it relates to the NIC to effectively manage a SONS. This component supported the field- and national-level exercises.

- **National-level Exercise**—An emergency operations exercise located in Washington, DC that tested national plans and USCG policies as it relates to a SONS. Participation included executive-level incident support and information coordination that would normally occur at participating federal, (primarily for the National Response Team) state, and corporate headquarters.
- **International-level Exercise**—A command post exercise located in Ensenada, Mexico that tested the *Joint Contingency Plan between the United Mexican States and the United States of America Regarding Pollution of the Marine Environment by Discharges of Hydrocarbons or other Hazardous Substances* (MEXUS Plan) and the *Pacific Annex of the MEXUS Plan* (MEXUSPAC Annex). The Mexican Navy set up a command structure in response to the exercise scenario, just as it would in the event of a real incident in which oil spilled in U.S. waters would reach, or threaten to reach, Mexican waters.

The California SONS 2004 Executive Seminar, located in Washington, DC on the last day of the exercise, gathered senior agency officials and industry representatives to discuss inter-agency issues that emerged during the exercise. Under this approach, national issues that surfaced at the local and regional levels could be simultaneously raised and discussed with senior agency officials. Participants were familiarized with the NRS and the approach to a SONS response. During the seminar, a video teleconference meeting was held with the NIC Unified Command (UC) to update participants on the response activities at that time of the exercise.

Hotwashes were conducted at all of the venues following the exercise to help identify issues and gaps in the response to these simulated oil spills. This After Action Report presents the major issues that have NRS implications. This report is designed to drive improvements to the prevention and/or response systems and national preparedness. This report is divided into the following sections:

- **Executive Summary**—Highlights the exercise scope and key issues.
- **Exercise Overview**—Provides background information on the exercise, the concept and design, and participating organizations.
- **Exercise Goals and Objectives**—Lists the six major exercise objectives and supporting objectives for each level of exercise participation.
- **Exercise Events Synopsis**—Summarizes the exercise scenario.
- **Issues and Corrective Actions Identification**—Presents the major issues that have NRS implications and provides corrective actions for each.
- **Conclusion**—Summarizes the major conclusions and key findings.

- **Appendices**—Presents the report’s supporting background information, such as a list of participating organizations, the SONS progression chart, and contact information for the key planners of the exercise.

2.2 SONS Description

In drafting the Oil Pollution Act of 1990 (OPA 90 or OPA), Congress recognized that incidents of large magnitude demanded attention of the federal government in ways that far exceeded the normal technical assistance and support teams provided by the NRS (Regional and National Response Teams), as described in federal regulations under the National Oil and Hazardous Substances Pollution Contingency Plan (more commonly known as the National Contingency Plan, or NCP). OPA 90 increased the President’s authority to assure readiness to respond to the threat of oil spills. Moreover, the law required the NCP be amended to include criteria to address significant threats to public health and welfare from oil spills.

Consequently, the NCP was amended to include a section to address a SONS. The NCP states that the USCG’s Commandant may name a National Incident Commander to assume the role of the On-Scene Coordinator (OSC) in communicating with affected parties and coordinating federal, state, local, and international resources at the national level. The NCP defines a SONS as:

A spill that, due to its severity, size, location, actual or potential impact on the public health and welfare or the environment, or the necessary response effort, is so complex that it requires extraordinary coordination of federal, state, local, and responsible party resources to contain and clean up the discharge. (40 CFR §300.5)

The USCG’s strategy for meeting the intent of the regulations is described in its Incident Command System (ICS) Implementation Plan (Commandant Instruction M3120.15). This plan prescribes ICS as the management system, and requires Area Commanders to ensure capability to manage a SONS as the NIC in their areas of responsibility. As a result, the NIC organization is tested during large-scale exercises, such as a SONS exercise.

2.3 SONS Program

The SONS program is designed to increase the preparedness of our nation’s entire response organization. Previous SONS exercises were conducted in Philadelphia, PA in 1997; Valdez, AK in 1998; and New Orleans, LA in 2002. The SONS Progression Chart in Appendix 2 shows the major issues from these exercises, including those from SONS 04. The purpose of the SONS program is to ensure that issues raised in these exercises are resolved and exercised in

future SONS exercises. In planning for the next SONS, scheduled for 2007, issues identified in the progression chart and the solutions subsequently developed to address those issues will be exercised.

The major objectives of the SONS program are as follows:

- Increase national preparedness for a SONS by engaging all levels of spill management in a coordinated response.
- Improve ability of the NIC organization to manage a SONS.
- Ensure senior agency officials and law makers are aware of their role in a SONS response.

2.4 Exercise Plans and Policies

The following plans and policies were exercised during SONS 04.

2.4.1 National

- National Contingency Plan, 40 CFR §300
- Initial National Response Plan
- National Incident Management System
- National-level policies
- MEXUS Plan.

2.4.2 Regional

- Regional Contingency Plan, Region IX
- USCG Implementation Plan, Commandant Instruction M3120.15
- Incident Command System, Commandant Instruction 3120.14
- Incident Management Handbook, Commandant Publication P3120.17
- MEXUS PAC.

2.4.3 Port

- Industry Response Plans
- San Diego Area Contingency Plan (ACP)
- LA/LB ACP
- Vessel Response Plans (Industry)
- California Oil Spill Contingency Plan.

2.5 Exercise Response Organizations

Players at all levels of the response organization were expected to respond as they would during an actual event. In previous SONS exercises, a responsible party (RP) was played by one petroleum company. The SONS 2004 exercise promoted the API SONS Consortium, a new model where, participation, information, funding and response techniques are shared amongst multiple industry participants. This model allowed for greater participation and training

of companies who previously would not have had the resources to participate. The Consortium was composed of six petroleum companies, chaired by ChevronTexaco, co-chaired by ConocoPhillips, and included industry members from eight countries. Participants from the API SONS Consortium participated as members from a fictitious oil company named Keydet Energy.

2.5.1 National

National-level exercise participation during SONS 04 included executive-level incident support and incident and information coordination that normally occurs at Washington, DC headquarters of participating federal agencies, the headquarters of participating state agencies, and at the corporate headquarters of the incident's RP. The following organizations participated at the national level:

2.5.1.1 *USCG Headquarters*

A situation and resource unit augmented the Command Center during the exercise. In addition, a number of offices with USCG Headquarters and the Washington, DC area participated, including the National Pollution Fund Center and USCG's Office of Response (G-MOR), Office of Maritime Port Security Programs (G-MPP), Office of Operational Contingency Planning (G-OPF), Office of Maritime and International Law (G-LMI), and the Marine Safety Center.

2.5.1.2 *Homeland Security Operations Center (HSOC)*

Located at Department of Homeland Security (DHS) headquarters, the HSOC is the primary national-level hub for operational communications and information pertaining to incident management that integrates and provides overall steady state threat monitoring and situational awareness for domestic incident management on a 24/7 basis. The HSOC serves as the Secretary's primary point of coordination. During the exercise, the HSOC coordinated response efforts with the Interagency Incident Management Group (IIMG) and utilized the Marine Information for Safety and Law Enforcement (MISLE) System for situational awareness information.

2.5.1.3 *Interagency Incident Management Group (IIMG)*

To facilitate national-level incident management and coordination of federal operations and resources, the Secretary of DHS may activate a tailored, task-organized headquarters-level IIMG (co-located with the HSOC) comprised of senior representatives from DHS components, other federal departments and agencies, and nongovernmental organizations, as required. In SONS 04, the IIMG coordinated with the HSOC and worked with the National Response Team (NRT).

2.5.1.4 *National Response Team (NRT)*

The NRT consists of 16 federal agencies with interest and expertise in various aspects of emergency response to pollution incidents. The NRT is a planning,

policy, and coordinating body that provides national level policy guidance prior to an incident, but does not respond directly to an incident. They assist the Federal On-Scene Coordinator (FOSC) during an incident by providing technical advice or access to additional resources and equipment at the national level. In SONS 04, the NRT was activated and convened at USCG Headquarters. In addition, it supported the exercise with technical advice and resource coordination.

2.5.2 Regional

The NCP requires the USCG Commandant to designate a NIC when a SONS is declared. Commandant Instruction 16465.1 SONS Response Management System authorizes USCG Area NIC or Regional Incident Command (RIC) for any incident that significantly taxes the resources and span of control of the FOSC when responding to that incident. The RIC/NIC is modeled on the National Interagency Incident Management System (NIIMS) Area ICS organization. The function of the RIC/NIC response organization is to provide overall strategic management to large, complex incidents. Like the port-level organization, the RIC/NIC organization is a UC, supported by the staffs of the Unified Commanders and other federal, state, and industry response organizations. In SONS 04, the Mexican Navy provided liaison officers to the RIC/NIC organization per MEXUSPAC Annex. The NIC was comprised of (1) the Commander of USCG Pacific Area, (2) the Director of OSPR, and (3) the Senior Keydet Energy Executive, in this case, the Vice President of ChevronTexaco Shipping

Prior to the designation of the scenario incident as a SONS, the Commander of the 11th USCG District determined that the incident warranted the establishment of a RIC. The RIC UC consisted of (1) the Commander, 11th USCG District, (2) the Director of OSPR, and (3) the Senior Executive of Keydet Energy. The following organizations participated at the RIC/NIC level during the exercise:

2.5.2.1 Principal Federal Official (PFO)

The INRP provided for the designation of a PFO by the Secretary of DHS when the INRP was activated. For this exercise, the NIC also served as the PFO. A Deputy PFO and support staff comprised of representatives from the various DHS Directorates, Offices, and Agencies deployed to the NIC command post to support the PFO.

2.5.2.2 Regional Response Team (RRT) IX

RRTs are the next organizational level in the federal response system. RRT IX includes the states of Arizona, California, and Nevada. Each team maintains a Regional Contingency Plan (RCP) and both state and federal governments are represented. The RRTs provide guidance to FOSCs through the RCPs and provide assistance requested by the FOSC during an incident. RRTs may also provide assistance to state and local governments in preparing, planning, or training for emergencies. The Environmental Protection Agency (EPA) and the

USCG co-chair the RRTs. Like the NRT, the standing RRTs are planning, policy, and coordinating bodies, but do not respond directly to the scene. RRTs were activated on the first day of the exercise and provided assistance regarding dispersant applications.

2.5.2.3 *San Diego and Los Angeles Federal Bureau of Investigation (FBI)*

The FBI San Diego and Los Angeles Offices participated with the USCG related to investigating the cause of these incidents. Given the current concerns regarding national security, it was necessary to quickly determine the cause of the major maritime incidents used in the exercise scenarios. This exercise presented a unique opportunity for the FBI and USCG to exercise the processes in place to support the initial investigation related to the cause of major maritime incidents. This exercise concluded that the investigation effort did not hamper oil spill response operations.

2.5.3 *Port*

At the port (local) level a UC was formed in accordance with the respective ACPs in San Diego and Los Angeles. The UCs used an ICS organization to manage and direct the tactical response to the incidents presented in the scenarios. The UCs consisted of an FOSC (USCG for maritime incidents), a State On-Scene Coordinator (SOSC) (California Department of Fish and Wildlife, OSPR), and a RP (Keydet Energy).

The FOSC, SOSC, and RP were supported by their staffs and were represented throughout the ICS organizations according to the capabilities of each organization. Other federal, state, and local government agencies and industry response support organizations were also represented in the port-level ICSs. As per the MEXUSPAC Annex, the Mexican Navy provided liaison officers to the San Diego command post and the NIC command post.

2.5.3.1 *Government of Mexico (GOM) Port-level Response Organization*

The Mexican Navy stood up its own command structure in response to the exercise scenario, as it would for a real incident in which oil spilled in U.S. waters would reach, or threaten to reach, Mexican waters. The Mexican Navy response organization was organized per the guidance of the GOM's oil spill contingency plan. Rather than a UC, the Commander of the 2nd Naval Zone (located in Ensenada, Mexico) was appointed the Incident Commander. His staff, as well as representatives from other GOM agencies, and Keydet Energy made up the response organization. Per the MEXUSPAC Annex, the USCG provided liaison officers to the Ensenada command post. Participation included the following:

- SEMAR
- PROFEPA
- Pemex
- SAGARPA
- SALUD

- Proteccion Civil
- CICESE
- CAN
- Instituto do Investigaciones Oceanologicas
- Facultad de Marinas
- Ecologia Estatal
- Aduanas
- Migracion
- Secretaria de Comunicaciones.

2.5.3.2 California State Interagency Oil Spill Committee (SIOSC)

SIOSC members established and maintained liaison with federal and local agencies, and public and private organizations engaged in oil pollution and control. Members provided input to the RRT, the FOSC and SOSC in an oil spill emergency. The SIOSC members were kept apprised of the SONS by the OSPR Operations Center located in Sacramento, California.

2.5.3.3 Oil Spill Response Organizations (OSROs)

Various OSROs participated in both the actual and simulated deployment of equipment during the exercise. The organizations included:

- The Marine Spill Response Corporation (MSRC); and
- Clean Coastal Waters Cooperative.

2.5.3.4 Keydet Energy Corporate Headquarters

No actual Corporate Headquarters participation was available, provided that Keydet was a fictional company. The Keydet Energy representative to the NIC simulated “corporate headquarters” input into the NIC.

2.5.3.5 Other Supporting Participants

Per the ACPs and ICS doctrine, UCs are responsible for coordinating their response operations with all affected stakeholders. Many different stakeholders participated in the exercise in the role that they would normally play in an actual response. Some of these other participating organizations included:

- San Diego UC Supporting Participants
- Joint Harbor Operations Center
- U.S. Navy 3rd Fleet
- LA/LB UC Supporting Participants
- Vessel Traffic Service Los Angeles
- Federal and State Natural Resource Trustees participating in a concurrent Natural Resource Trustee Exercise
- Oiled Wildlife Care Network facilities participating in a concurrent wildlife rehabilitation exercise
- Establishment of a Multi-Agency Committee for the coordination of assisting agency resources.

2.6 Response Resource Deployment Activities

The following response resource deployment activities were engaged during the exercise:

- USCG/FBI boarding teams
- Boom deployment for containment and recovery
- Protective boom deployments for environmentally sensitive areas
- Oil spill recovery vessels
- OSRO vessels and personnel
- Shoreline cleanup assessment teams
- USCG Vessel of Opportunity Skimming System
- Dispersant aircraft
- Cross border transport of resources
- USCG and industry dispersant aircraft.

The following Mexican response resource deployments were engaged during the exercise:

- Matamoros (naval vessel) deployed in U.S. waters
- 400 m of RO-boom 2000 (high seas)
- 300 m of RO-boom 1000 (harbor boom) and 1 skimming pump
- Bolkow BO-105 helicopter Mexican Navy.

2.7 Executive Seminar Overview

A catastrophic oil spill requires collaboration from all levels of government and industry, from the first responders to the senior agency officials. The California SONS 2004 Executive Seminar gathered senior officials from the federal government and industry concurrently with the SONS full-scale exercise. Under this approach, national issues that surfaced at the local and regional levels could be simultaneously raised and discussed with senior agency officials.

The objective of the seminar was to familiarize participants with the NRS and seek agreement on the approach to a SONS response. The objective of this seminar was a familiarization and discussion of:

- Response management structure and system for SONS.
- Impacts of the spill to public health, national security, environment, and economy.
- Information flow to our national leaders during a SONS.
- Response issues (capabilities, funding, terrorism, and international).

During the seminar, a video teleconference meeting was held with the NIC UC. The UC included the NIC, the RP, the SOSOC, the Mexican representative, and the Deputy PFO. The NIC provided a situational update and each member

briefed the seminar attendees on their respective roles in the exercise and their assessment of the coordinated response activities.

The seminar agenda is located in Appendix 3. The seminar was composed of the following briefings designed to educate the executive-level audience on NRS topics:

- National Contingency Plan
- INRP and NIMS
- SONS Response Management Organization
- Response Capabilities
- Environmental Impacts
- Industry Perspectives
- Funding – Oil Spill Liability Trust Fund
- Public Affairs: Coordinating Media, Crisis Communications, and Risk Communications.

2.8 SONS Training

In preparation of the exercise, numerous training sessions were offered to the participants. These trainings included the following:

- NIC-level Training Table Top Exercise (TTX) (included training Mexican participants)
- National-level Training TTX
- Incident Command System 100-400 (included training Mexican participants)
- Multi-Agency Team-Building Enhancement System (MATES)
- Situation Unit/Resource Unit Leader Orientation
- Liaison
- National Oceanic and Atmospheric Administration (NOAA) Shoreline Cleanup Assessment Team
- Risk Communications
- Joint Information Center (JIC)
- PFO Orientation
- Incident Response Planning Workshop
- Dispersants (included training Mexican participants)
- Net Environmental Benefit Analysis (NEMA) (included training Mexican participants)
- Incident Action Plan (IAP) Software
- MISLE System.

The NIC- and National-level Training TTXs were conducted in September and October 2003, respectively, in preparation for the SONS 04 exercise. The major issues raised from both TTXs are listed in Appendix 4.

2.9 Exercise Artificialities

This exercise was designed to maximize realism and minimize artificialities. Exercise artificialities included the following:

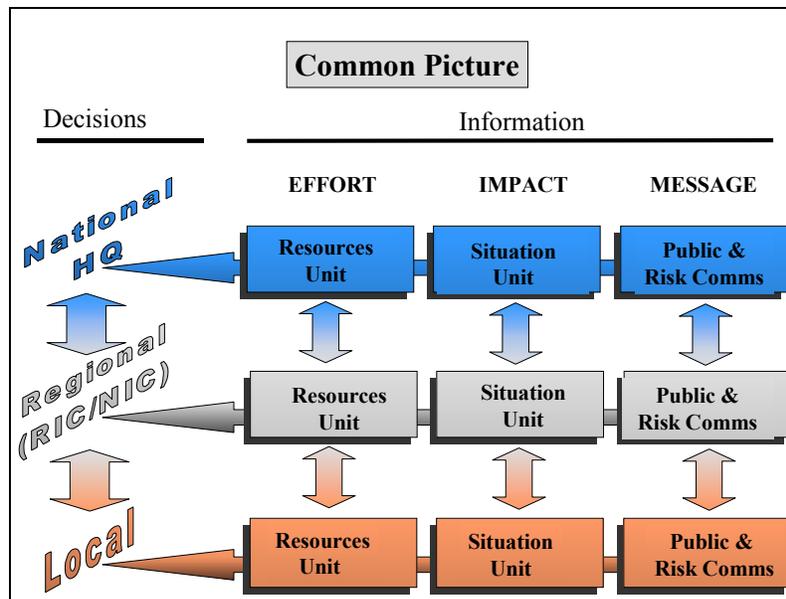
- Keydet Energy, representing the API SONS Consortium, acted as the owner of record for both vessels and provided RP information and decisions.
- Simulated Keydet Energy Offices
 - LA/LB—Keydet Energy simulated offices at the USCG Integrated Support Command in Long Beach.
 - San Diego—Keydet Energy simulated offices established at the command post at the 63rd Regional Support Command, U. S. Army Reserve Center.
- Vessel information, vessel response plans, spill management teams and response operational processes. While these were fictitious, they were modeled on the actual information, plans, and response processes/systems used by one or more of the API member companies participating in the exercise.
- The scenario was designed to consider certain response actions including the use of dispersants, the development of salvage and lightering plans, and the implementation of associated security plans while the cause of these incidents is being investigated. Exercise controllers and evaluators were pre-positioned to anticipate where and when certain actions are to take place for their control and evaluation.
- All command posts were identified and established prior to exercise week in order to maximize the benefit of the multi-agency responders to interact and focus on all other response activity.
- The RIC and NIC stood up operations on the first day of the exercise to maximize their experience with managing large-scale responses. In a real world situation, it might take several days for these organizations to be fully staffed and operational.

2.10 SONS Common Operational Picture

The SONS 2004 exercise involved three management levels: national, regional, and port (which included international). One of the most critical command and control elements of this tiered response management system was ensuring a “common situational picture” existed at all of its organizational levels. The system is depicted in *Figure 2-1*. Program managers and senior government officials, particularly at the national level, were clearly articulating their information requirements to all levels of the response organization, thereby ensuring that the situational information developed within the various command posts incorporated these requirements. For SONS 2004, information

requirements were developed with the DHS, the NRT, and USCG Headquarters Marine Safety, Security and Environmental Protection programs.

Figure 2-1. SONS Common Operational Picture



At the field (UC) and regional (NIC) command posts, one of the methods used to develop and disseminate this information included a combination of response management software applications (industry IAP at the UCs and USCG MISLE at the NIC). The primary purpose of both systems was to manage all elements of ICS planning activities within each command post. Each planning section within the field and NIC command posts included Situation Units and Resource Units where all information related to the incident(s) were tracked and displayed. USCG Headquarters set up a Situation and Resource Unit within its Command Center.

Situational and resource information at the three field-level UCs (including Mexico) were entered into their respective industry-operated IAPs. The NIC situation and resource units helped develop a SONS common situational picture that included response and planning activities from the three geographic areas of the response. This information was contained within MISLE.

3

EXERCISE GOALS AND OBJECTIVES

3.1 Major Objectives

The major objectives were developed and agreed upon by the California Spill of National Significance 2004 exercise (SONS 04) sponsors. Each of these objectives was achieved during the exercise. The major objectives of SONS 04 were:

- Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.
- Assess the viability and compatibility of all plans appropriate to support a SONS response.
- Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.
- Evaluate the ability of the Unified Command (UC) to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.
- Exercise any policy, departmental restructuring, and/or new regulatory requirements (e.g., Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.
- Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan (also known as the Pacific Annex to the *Joint Contingency Plan between the United Mexican States and the U.S. Regarding Pollution of the Marine Environment by Discharges of Hydrocarbons or other Hazardous Substances*).

3.2 Supporting Objectives

During the planning stages, three meetings were held with participating organizations to develop supporting objectives. Each organization was encouraged to develop these objectives for their internal review process. These objectives were not tracked or evaluated by the exercise evaluators during the exercise. These supporting objectives reflected the six major objectives.

3.2.1 Headquarters/National Response Team (NRT)

3.2.1.1 *Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.*

- Assess the activation of the NRT and establishment of a National Incident Command (NIC) to support this incident.
- Assess the interaction between the NIC and NRT.
- Assess the role of the NRT in supporting the NIC.
- Assess the role of the NIC in supporting the NRT.
- Assess the ability of the response organizations to implement all aspects of the National Incident Management System (NIMS) as appropriate.
- Assess the ability to implement a credentialing process throughout the response organization per the National Response Plan (NRP).
- Assess the ability of Coast Guard Headquarters (CGHQ) to coordinate with the Department of Homeland Security (DHS).
- Assess impact of operations security requirements on incident information flow.
- Assess the ability of CGHQ to disseminate information throughout all levels of government.
- Assess the ability of CGHQ to establish information reporting requirements throughout the response organization.
- Assess the ability of CGHQ to provide USCG Public Affairs guidance to all levels of the USCG Response Organization.
- Test the ability of Finance Cells at the NIC and subordinate Incident Command System (ICS) levels to (a) concurrently manage multiple funds provided from multiple sources for the incident; (b) effectively coordinate relevant information; and (c) provide timely, accurate incident financial data to the NIC and other national officials.

3.2.1.2 *Assess the viability and compatibility of all plans appropriate to support a SONS response.*

- Exercise the internal contingency support plans of all NRT Member Agencies.
- Assess the capability of member NRT Agencies to communicate incident information to Secretary/Administrator Level and impact of incident to Agency operations/resources.
- Assess the capability of the NRT to coordinate with affected non-government organizations at the national level.
- Assess the role and presence of both state and industry “response organizations” within the NRT.
- Assess the initial exchange of information within the Maritime Domain Awareness intelligence and information network with respect to make a determination as to the possible causes of the incident.

- Test how the National Contingency Plan and its pollution funding mechanisms interact with the Federal Response Plan Funding Appendix structure when USCG is the Lead Federal Agency.

3.2.1.3 *Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.*

- Assess the availability of Tier 3 Response Resources.
- Assess the capability of NRT Member Agencies to identify and provide internal response resources to support response operations.
- Assess the capability to obtain the Department of Defense (DOD) resource support for response operations.
- Assess the ability of DHS to allocate federal resources to multiple incidents within the guidance of the NRP.
- Test the recently amended Oil Pollution Act (OPA) Provision allowing for \$100M Advance to the Emergency Fund for response purposes only.
- Test the USCG's ability, using only current year Operating Expense Appropriations, to establish an emergency field office that can accept, review, and approve for payment OPA claims to injured parties.

3.2.1.4 *Evaluate the ability of the Unified Command to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.*

- Incorporate into the NIC Finance Cell representatives of the responsible party (RP) and the Insurers/Guarantors, so that all financial flows associated with the response can be fully integrated.

3.2.1.5 *Exercise any policy, departmental restructuring, and/or new regulatory requirements (such as: Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.*

- Exercise the revised Dispersant, Salvage, and Marine Fire Fighting Regulations.
- Exercise the newly established Endangered Species Act Memorandum of Understanding (MOU) with the U.S. Department of the Interior.

3.2.1.6 *Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan.*

3.2.2 NIC/Regional Response Team (RRT)

3.2.2.1 *Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.*

- Assess information flow between the NIC and Port command posts, the NIC and the RRT, the NIC and the NRT, the NIC and Headquarters, and across

all response organizations (CGHQ, industry crisis management organization, government office).

- Assess information flow between the NIC and Government of Mexico (GOM) per the MEXUSPAC Annex.
- Assess industry/state role in the NIC and define the optimal NIC organization.
- Assess the ability of the NIC to incorporate RRT input into response processes and coordinate response responsibilities with RRTs.
- Assess the ability of the Maintenance and Logistics Command to support the NIC.
- Define role of the GOM in the NIC.

3.2.2.2 *Assess the viability and compatibility of all plans appropriate to support a SONS response.*

- Assess the impact of the NRP on the NIC.
- Ensure the exercise remains focused on response (versus terrorism).
- Assess usability and effectiveness of all response plans (Regional Contingency Plan, SONS Instruction, Industry Crisis Management Plans, MEXUSPAC Annex, etc.)
- Assess U.S. and GOM's ability to coordinate dispersants use.

3.2.2.3 *Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.*

- Assess the ability of the NIC coordinating a Tier 3 response equipment deployment.
- Assess the ability to deploy salvage, firefighting, dispersant and mechanical recovery equipment to a SONS incident.
- Ensure that equipment deployment is within exercise budget.
- Access DOD resource capability.
- Review oil spill and natural disaster fund (GOM).
- Evaluate and develop new response (incident action) plans as appropriate.

3.2.2.4 *Evaluate the ability of the UC to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.*

- Assess ability of the federal, state, and industry supporting and cooperating agencies to support the NIC and NIC staff.
- Assess ability of USCG Incident Management Assist Teams to support Federal On-scene Coordinators (FOSCs.)
- GOM supporting objective: Evaluate the response capability of the Mexican Navy at the national and regional level, and the response of those Mexican agencies similar to the U.S. (e.g., PROFEPA.)

3.2.2.5 *Exercise any policy, departmental restructuring, and/or new regulatory requirements (such as: Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.*

- Assess the ability of the NIC to incorporate all appropriate policies, MOUs and Memoranda of Agreement (MOAs) into its processes.
 - Endangered Species Act
 - New RRT Dispersant policy
 - State of California salvage regulations.
- Assess the effects of DHS and State Office of Homeland Security reorganization on the NIC.
- Assess the ability of NIC to incorporate state and federal policy into salvage processes.
- GOM supporting objective: Evaluate response capability in case dispersants are necessary. Use SS Team to provide input on spill mitigation. (If the U.S. does use dispersants, they might consider allowing Mexico to access their scientific team to know what the impacts of dispersant would be.)

3.2.2.6 *Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan.*

- Assess ability to coordinate cross-border movement of response personnel and equipment.
- Assess ability to reimburse the GOM and private party claims.
- Assess ability of the NIC to coordinate dispersant use with the GOM.
- Assess ability of the NIC to coordinate disposal with the GOM.
- GOM supporting objective: Review movement of equipment/personnel across borders, and the relevant customs/immigration procedures.
- GOM supporting objective: Assess immigration and customs procedures.
- GOM supporting objective: Evaluate coordination of port services.

3.2.3 Port of Los Angeles/Long Beach (LA/LB)

3.2.3.1 *Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.*

- Assess response organizations working together in a UC using an incident command structure.
- Exchange best practices; using state as foundation because of lack of turnover.
- Assess coordination of response organization between the Captain of the Port (COTP) zones. (Transition zone between two spills).
- Assess capability of Integrated Support Command (ISC) San Pedro.
- Assess the flow of information between federal/state/industry.
- Evaluate ability for surge operations (personnel).

- Determine how quickly the RP would integrate to the UC and with San Diego.
- Assess ability to access the Multi-agency Coordination.
- Evaluate internal staffing levels.

3.2.3.2 *Assess the viability and compatibility of all plans appropriate to support a SONS response.*

- Evaluate/validate area contingency plans and vessel response plans.
- Assess dispersant pre-approval plan.
- Validate site protection strategy (Clean Coastal Waters/Marine Spill Response Corporation pre-assessment).

3.2.3.3 *Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.*

- Evaluate all aspects of the Response Management Teams.
- Evaluate process to allocate resources.
- Assess ability to conduct dispersant application operations.
- Assess ability to deploy a representative sample of Tier 1, 2, and 3 equipment. Cascade out of state equipment.

3.2.3.4 *Evaluate the ability of the UC to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.*

- Assess communication ability between various agencies and assets.
- Assess ability to communicate response picture to the public.
- Assess implementation of various USCG resources.
- Assess ability to track resources and system. (The compatibility of software systems.) Deliver accurate status picture to the NIC.
- Assess capability to provide back support.
- Communication from field to UC on deployment/staging of resources.

3.2.3.5 *Exercise any policy, departmental restructuring, and/or new regulatory requirements (such as: Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.*

- Assess timelines and effectiveness of salvage equipment in AOR and process for determination of best source.
- Assess the on-scene availability/capability of necessary response teams and individuals (whether use of dispersant is actually simulated via flyover, or whether it's spelled out solely on paper is ok, but the group is looking for an estimated real-time deployment.)
- Assess dispersant availability/capability process.

3.2.3.6 *Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan.*

- Develop understanding of Mexican role in LA/LB response.
- Assess standing up of Joint Response Team (high-level Mexican/US team.)

3.2.4 *Supporting Objectives Port of San Diego*

3.2.4.1 *Assess the effectiveness and efficiency of the incident command organization for a SONS at all appropriate response organization levels.*

- Assess command post options.
- Assess capability of USCG activities in San Diego to support the FOSC.
- Assess effectiveness of liaison with affected counties and communities.
- Assess effectiveness in dealing with wildlife issues.
- Assess communications/coordination between San Diego and Mexican representatives on water assets, not only between USCG in San Diego and Mexico, but also between San Diego and Ensenada, and surface units in the U.S. and Mexico (ships, helicopters, etc. sharing radio frequency, language issues, other media.)
- Assess effectiveness of setting up the UC.
- Assess coordination and communication with the Mexican Navy in accordance with MEXUS Plan.
- Assess the viability and compatibility of all plans appropriate to support a SONS response.
- Assess revised area contingency plans.
- GOM sub-objective: Evaluate and make changes in local plans to correspond with Mexican national plan. (Port of Ensenada objective).
- Assess MEXUS PAC Annex.
- Correct plans to reconcile with the general plan (their version of NRP).

3.2.4.2 *Evaluate the availability and adequacy of response resources in accordance with appropriate response plans.*

- Evaluate process to allocate resources.
- Evaluate wildlife rehabilitation resources.
- Assess use of DOD/Navy assets.
- Assess how fast resources can be moved (GOM).

3.2.4.3 *Evaluate the ability of the UC to coordinate, control, and sustain a large-scale mobilization and deployment of private and public response resources.*

- Assess communication ability between various agencies and assets.
- Assess ability to communicate response picture to the public.
- Assess implementation of various USCG resources.

- Assess ability to track resources and system. (The compatibility of software systems.) Deliver accurate status picture to the NIC.
- Assess capability to provide back support.
- Evaluate communication from field to UC on deployment/staging of resources.
- Identify ability to access all District Response Group resources.

3.2.4.4 *Exercise any policy, departmental restructuring, and/or new regulatory requirements (such as: Marine Salvage, Firefighting and Dispersant capability) for supporting or influencing response.*

- Review new technologies for detecting and tracking oil spills.
- Exercise and assess existing MOUs with State of California.
- Assess the reimbursement process through the claims section.
- Evaluate implementation of NRP in the role of Homeland Security.

3.2.4.5 *Assess the joint U.S. and Mexican response coordination under the MEXUSPAC Annex of the MEXUS Plan.*

- Exercise the MEXUSPAC Annex.
- Assess the exchange of liaison officers with Mexico.
- Review movement of equipment/personnel across borders, and the relevant customs/immigration procedures.
- Review disposal of contaminants.
- Review use of computers/Internet to pass information to Mexico “officially” (rather than faxes).
- Test ability to actually move equipment across the border. (The group agrees to try to move something, say a small boat on a trailer, across border.)
- Assess capabilities to coordinate port services (e.g. if a Mexican Naval vessel needs to stop in U.S. Port for fuel/water, etc. as part of the response.)
- Identify which U.S. contractors cannot cross the border due to liability concerns.
- Evaluate getting clearance for USCG aircraft to fly into Mexican airspace to assess spills.

4

EXERCISE EVENTS SYNOPSIS

4.1 Scenario Overview

The California Spill of National Significance 2004 exercise (SONS 04) was performed real time and the exercise scenario provided enough detail to initially engage those entities and those actions that would normally occur in an actual event. The exercise planners created a Master Scenario Events List (MSEL), and a chronological list of injects, to drive the exercise play. Two thousand MSELs were created, each containing a scenario time, a synopsis, command post location involved, controller/evaluator instruction for delivering the inject, expected action, and the participating player(s)/organization(s). In addition, controllers, role players from various response organizations, a simulation cell, and a “truth cell” were engaged to ensure that expected actions in response to the players’ actions and decisions were taking place during this type of event. Figure 4-1 is a general outline of events that occurred. Figures 4-2 and 4-3 are the oil projection maps for the incidents.

4.2 Virtual News Network (VNN) Summaries

In addition to the MSELs, three simulated breaking news stories from a fictitious news station, VNN, were used to move the scenario forward. The following information was used in these news stories, which provide a synopsis of events that occurred over the course of the exercise:

4.2.1 Breaking News Story on 20 April, 2:00pm (PDT)

- Two massive oil spills have occurred within several hours of each other.
- The first spill was caused by an explosion aboard the oil tanker “Mariner” at four o’clock this morning, when the ship was just off the coast of Los Angeles. The tanker is owned by Keydet Energy Corporation and was carrying over 47 million gallons of oil. Officials on-site say that at least 1 million gallons of oil spilled into ocean waters.
- The second spill occurred just after noon today when a tank barge was struck by a large commercial fishing vessel, off the coast of San Diego. At least 420,000 gallons of oil spilled into the ocean, where currents could take it into Mexican waters.

- Authorities do not know the exact cause of either incident, and law enforcement agencies say they plan to investigate both.
- The State of California has never before allowed the use of dispersants in its waters, although there are areas that have been pre-approved for dispersant use.
- It is expected that beaches and ports from Long Beach to the Mexican border will be closed to all public access and ship traffic, including Navy vessels.
- Officials are concerned these incidents will compromise national security operations due to the extensive Navy Marine contingent in Southern California. A large percentage of this nation's military training and deployment evolutions occur in this area.

4.2.2 Breaking News Story on 21 April, 8:00am (PDT)

- Initial investigations suggest terrorism was not the likely cause of either incident.
- At nine o'clock last night, Huntington Beach, California was the first shoreline hit with oil. Volunteers with the California Department of Fish and Game are mobilizing to help rescue wildlife that may be in danger.
- Habitats for endangered species, such as the California Least Tern and Brown Pelican are in the paths of both the Los Angeles and San Diego spills.
- Protestors have gathered in Huntington Beach to complain about what they see as a slow and inefficient response to the oil spill. Authorities fear their presence could interfere with getting clean-up equipment to the scene.
- Near San Diego, oil spread into Mexican waters overnight, and the Government of Mexico has been working closely with U.S. officials. However, with new security measures in place along the border, sources say moving personnel and equipment quickly across the border may prove challenging.
- Ports of Los Angeles and Long Beach, the largest port complex in the U.S, have been affected by traffic redirection and delays for 24 hours. A closure of the Port of Los Angeles alone would result in a billion dollars a day lost to the local economy.
- There was a sharp decline in the Dow Jones Industrial Average. Stock prices dropped at least 15% for industries that depend upon this busy port as people speculate on the effects this spill could have on port traffic and the economy.

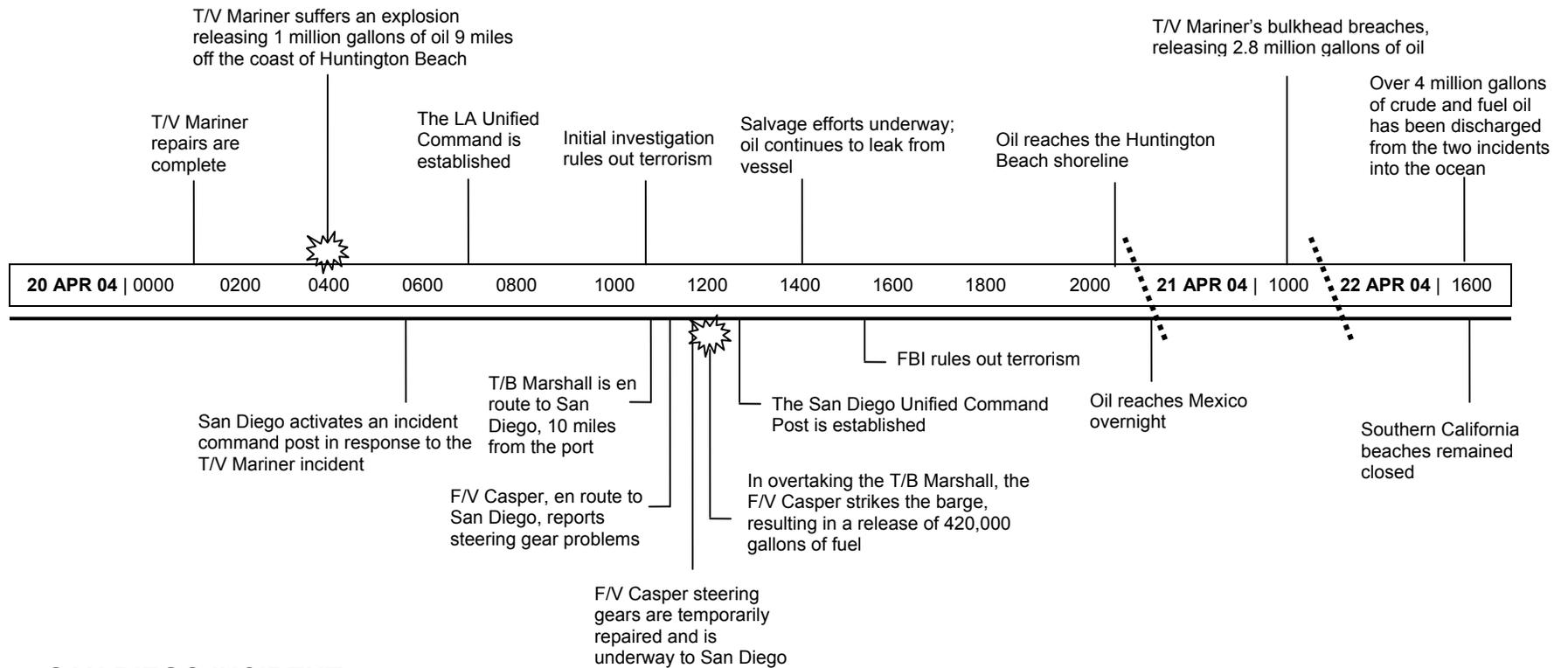
4.2.3 Breaking News Story on 21 April, 4:00pm (PDT)

- The Coast Guard, State of California, and Keydet Energy officials report that almost 4 million gallons of oil spilled into the ocean.

- Southern California beaches are closed today, and will remain closed for weeks. Environmental monitoring will be done to ensure the safety of the beaches before they are re-opened to the public.
- At this time, no one knows how long the cleanup will take or how long the beaches – some of California’s top tourist attractions – will remain closed. Environmental groups remain concerned about the long-term impact to the local ecosystems.
- It is too early to know the effect these spills will have on the public’s willingness to purchase seafood from this region. Some local business leaders predict that many companies that depend on the ocean for revenue will be bankrupt before the end of the year. This could very well become a political campaign issue this election year.
- Initial estimates on the cost of the cleanup alone are in the hundreds of millions of dollars, and cleanup efforts may continue well into 2005.

Figure 4-1. Incident Time Line*

LOS ANGELES INCIDENT



SAN DIEGO INCIDENT

* All times are approximate.

Figure 4-2. Oil Trajectory for the LA/LB Incident

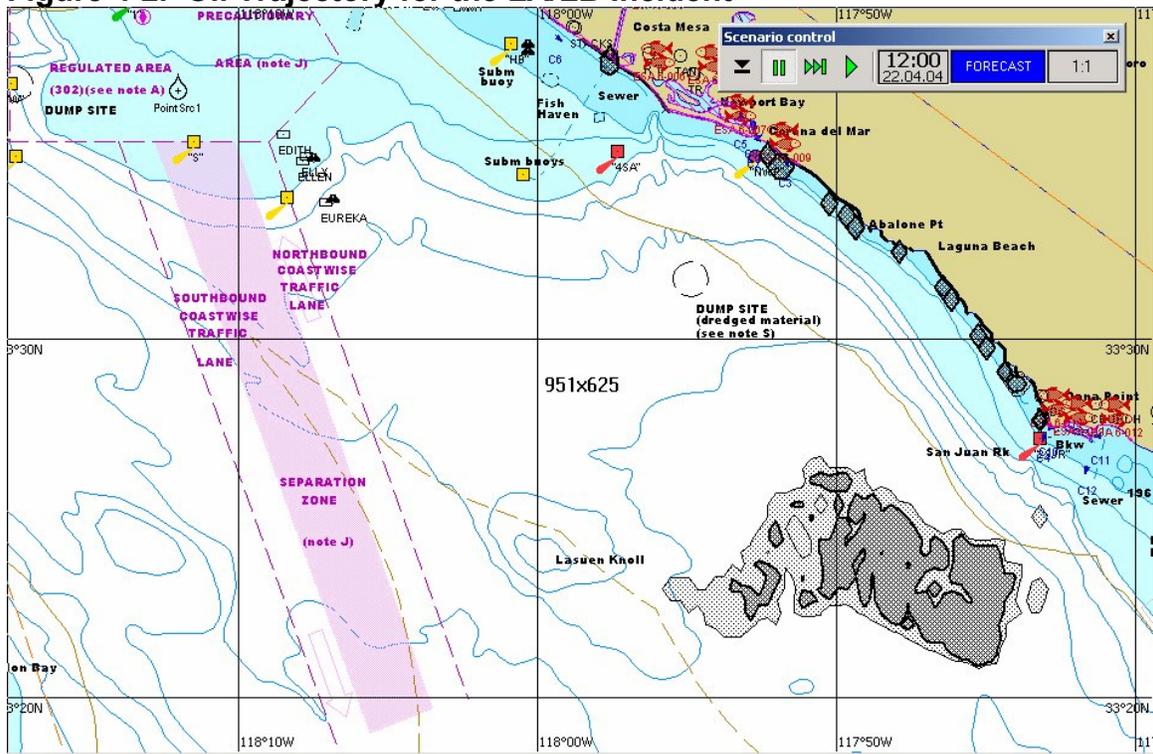
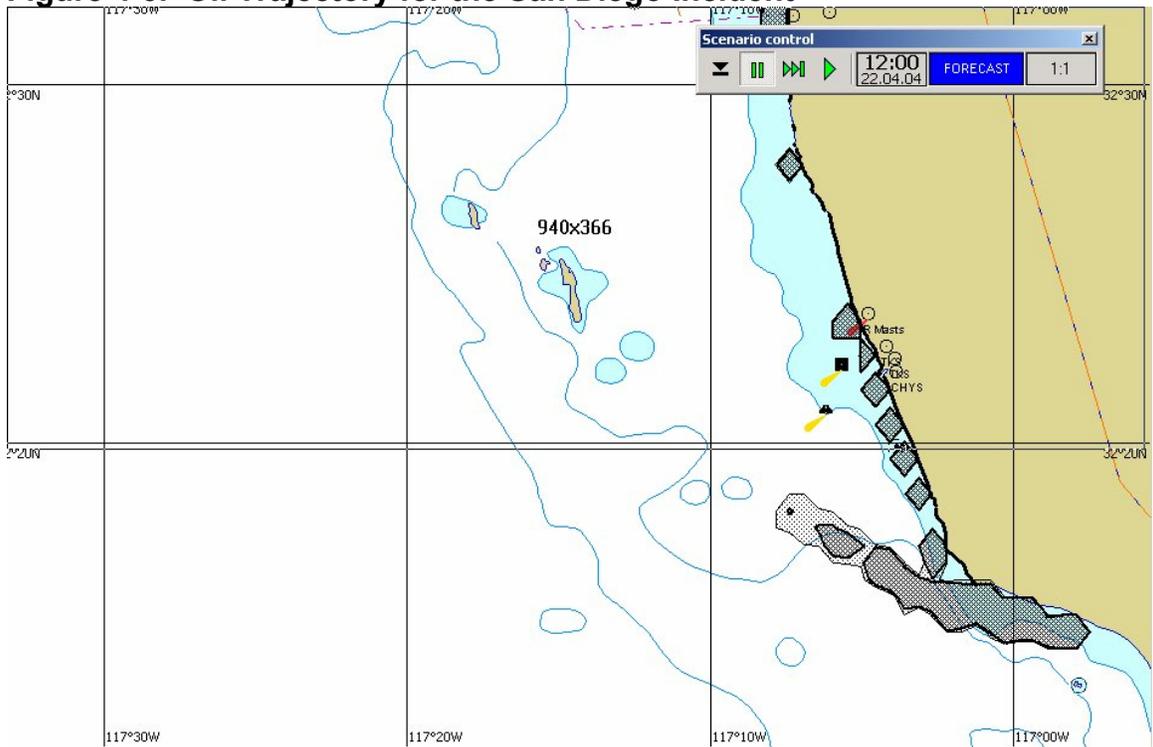


Figure 4-3. Oil Trajectory for the San Diego Incident



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5

ISSUES AND CORRECTIVE ACTIONS IDENTIFICATION

5.1 Laws and Authorities

The Laws and Authorities program element refers to the legal underpinning for federal, state, and local statutes, and any implementing regulations that establish legal authority for development and maintenance of the emergency management program and organization. This program element also defines the emergency powers, authorities, and responsibilities of the chief executive official and the emergency management coordinator. Laws and authorities serve as the foundation for the emergency response and its activities.

5.1.1 Jones Act Clarification

5.1.1.1 *Observations*

The Jones Act (46 US Code Appendix 883) prohibits the transportation of cargo between U.S. ports on a foreign-flagged vessel. The purpose of this law is to protect the U.S. flagged vessels from foreign competition within the domestic trade routes. The U.S. Coast Guard (USCG) inspects and enforces the provision relating to whether a vessel is foreign-owned or flagged, or exempted according to the Jones Act. The Department of Homeland Security's (DHS's) Border & Transportation Security (B&TS) may grant a waiver to this law for national defense purposes. The Federal On-scene Coordinator (FOSC) determines whether a U.S. vessel is immediately available for oil spill operations, and therefore can engage foreign vessels in oil spill recovery operations. During the exercise, questions raised to the National Incident Command (NIC) and Principal Federal Official (PFO) staffs regarding the enforcement of regulations were not answered. B&TS members responded that they do not have responsibility/ownership for enforcing the regulations. Clarification of which agency(ies) have responsibility for Jones Act is needed and a Memorandum of Agreement (MOA) for emergency waiver authority should be completed.

5.1.1.2 *Recommendation*

Clarification of which agency(ies) have responsibility for Jones Act enforcement is needed and an MOA for emergency waiver authority should be completed.

5.1.1.3 *Improvement Actions*

The USCG in coordination with the DHS/Interagency Incident Management Group (IIMG), Department of Justice, B&TS, and other pertinent agencies should clarify enforcement responsibilities under the Jones Act. These agencies should develop an MOA that establishes the process for obtaining an emergency waiver.

5.1.1.4 *Responsible Organizations/Time Frame*

USCG in coordination with DHS, the Department of Justice (DOJ), B&TS /September 2005.

5.1.2 Expedited Cross Border Exchange of Response Resources

5.1.2.1 *Observations*

Existing guidance and procedures for cross border transportation of response personnel, equipment, aircraft, vessels are inadequate in the current MEXUS Plan (also known as the *Joint Contingency Plan between the United Mexican States and the United States of America Regarding Pollution of the Marine Environment by Discharges of Hydrocarbons or other Hazardous Substances*). Expedited emergency clearance procedures (such as those for aircraft, vessels, equipment, vehicles) need to be lined out in MEXUS Plan for emergency response operations.

5.1.2.2 *Recommendation*

The transportation section of MEXUS Plan/MEXUSPAC Annex (also known as the Pacific Annex of the MEXUS Plan) should reflect detailed procedures for transportation across U.S./Mexico border. Plans for coordination across all international borders should be assessed and changes made if necessary.

5.1.2.3 *Improvement Actions*

The USCG, in coordination with B&TS, DHS, U.S. Department of State (DOS), the U.S. Navy (USN), and the Federal Aviation Administration (FAA), should rewrite the transportation section of the MEXUS Plan/MEXUS PAC to include procedures for transportation across the U.S./Mexico border.

5.1.2.4 *Responsible Organizations/Time Frame*

USCG (G-MOR, PAC Area, LAN Area) in coordination with B&TS, DOS, USN, and the FAA/ To be developed under auspices of the Pacific Joint Response Team (JRT) prior to 2006.

5.1.3 Cross Border Waste Disposal

5.1.3.1 *Observations*

Clarification of cross border waste disposal is needed in the MEXUS Plan and MEXUSPAC Annex, which states that collected oil is given back to the

Responsible Party (RP) for disposal. The plan does not address whether B&TS would allow waste to be transported across the border.

5.1.3.2 Recommendation

Guidelines and procedures should be created to describe the interaction between the federal and state governments and Mexico (as well as other international partners) regarding cross border waste disposal.

5.1.3.3 Improvement Actions

The USCG and Mexican Navy should work with B&TS and Mexican Customs to develop guidelines and procedures for transporting hazardous waste across the U.S./Mexican Border. These guidelines and procedures should address Mexican law that requires a RP to remove hazardous waste from Mexico if it did not originate in Mexico; the location of staging areas in Mexico; development of a standard method of information exchange; development of a standard mechanism for U.S./Mexico requests for assistance; and waste management requirements in the contingency plan.

5.1.3.4 Responsible Organizations/Time frame

USCG (G-MOR, PAC Area, LAN Area) and Mexican Navy in coordination with B&TS and Mexican Navy /To be developed under auspices of the Pacific JRT prior to 2006.

5.1.4 Cross Border Wildlife

5.1.4.1 Observation

The MEXUS Plan does not address cross border wildlife response issues.

5.1.4.2 Recommendation

Guidelines should be developed to address response to oiled wildlife across the U.S./Mexican border. These guidelines should discuss Lacey Act issues, as well as how to dispose of oiled carcasses as hazardous waste.

5.1.4.3 Improvement Actions

The USCG, in coordination with the U.S. Fish & Wildlife Service, the California Office of Spill Prevention and Response (OSPR) and the Government of Mexico (GOM) should develop guidelines for responding to oiled wildlife across the U.S./Mexican border.

5.1.4.4 Responsible Organizations/Time frame

USCG in coordination with the U.S. Fish & Wildlife Service and OSPR/To be developed under auspices of the Pacific JRT prior to 2006.

5.2 Resource Management

Resource Management program element involves the systematic development of methodologies for the prompt and effective identification, acquisition, distribution, accounting, and use of personnel and major items of equipment for essential emergency functions.

5.2.1 Information Management

5.2.1.1 *Observation*

Decision makers need accurate data to make strategic decisions about critical resource needs. Information communicated through the chain of command should be correct and as complete as possible. Information needs were not completely met on any level during the exercise.

Agencies brought different Geographic Information System (GIS) software capability to the exercise. All GIS resources should have been centralized at each command post into one location but were not. Centralizing the systems would have allowed users to get and receive the necessary and available information in one spot. Additionally, GIS operators need to be staffed for a 24/7 work day, so that the night shift has the necessary expertise to use the GIS. They also need to be recognized in the Incident Command System (ICS) and given ample space in the Control Room. An integration process should be conducted.

5.2.1.2 *Recommendation*

Information management needs should be defined for the national, regional, and port levels in order to effectively manage resources. Information for resource management should include identification of resource, process for collecting resources, dissemination or deployment of resources and equipment, and timing.

5.2.1.3 *Improvement Action*

Tools, job aides, and guidance should be developed to define resource management informational needs at all levels.

5.2.1.4 *Responsible Organizations*

The National Response Team (NRT), chaired by USCG, in coordination with the Regional Response Team (RRT) and DHS

5.2.2 Incident Management Applications

5.2.2.1 *Observations*

Various applications were used for incident management. Industry used an Incident Action Plan (IAP) database program; USCG used the Marine Information for Safety and Law Enforcement (MISLE) system; Marine Spill Response Corporation (MSRC) used a separate spreadsheet to enter resources in

lieu of the IAP database. The National Oceanic and Atmospheric Administration (NOAA) website, chat rooms, e-mail broadcast and other applications were also used for information dissemination. There was a lack of familiarity of systems that caused problems. There were also too many systems that provided the same type of information, but not in a consistent manner and not with consistent information.

Different versions of ICS forms were used in the command posts causing confusion and disruption.

The NOAA spill web site was considered highly valuable and should have been utilized by the National Incident Command Joint Information Center (JIC) as opposed to creating a separate web site for the JIC, which can lead to incorrect and conflicting information being released to the separate sites. The NOAA site is well known and recognized by most stakeholders in the response community. It is maintained and managed by an agency other than the USCG, state, Responsible Party etc. and, therefore, adds credibility similar to a third party report. It is also being maintained by experienced operators.

5.2.2.2 Recommendations

As a first step, an industry-government working group with appropriate specialists should be created to address a standardized or coordinated process for information management applications, define the requirements, and identify the best course of action. The NOAA spill web site should be considered for national application during an incident.

5.2.2.3 Improvement Actions

Convene working group and establish best course of action for creating a standardized process for information management applications.

5.2.2.4 Responsible Organization

American Petroleum Institute, USCG, Environmental Protection Agency (EPA), NOAA, DHS (Science & Technology).

5.2.3 National Incident Command (NIC) Planning and Operations

5.2.3.1 Observations

5.2.3.1.1 NIC/Regional Incident Command (RIC) Issues:

- Greater State Representation of NIC Staff: During the exercise, briefings at the NIC were mostly presented by USCG personnel and there was no state representation on the night shift (possibly because of an exercise artificiality due to budget constraints.) There should be a strong state representation in the RIC/NIC or (Joint Field Office (JFO)). A policy statement needs to be added to the Spill of National Significance (SONS) Instruction to address this issue.

- RRT Co-Chair Responsibilities: The USCG RRT Co-Chair had two hats as the Deputy RIC, causing disruptions to RRT decision making efforts.
- GOM in the RIC/NIC: The GOM's participation in the RIC/NIC organization proved critical, as it allowed a first person exchange of information and better understanding of mutual and distinct issues. Special considerations for a GOM liaison in the RIC/NIC (or JFO) should be assessed.
- Inadequate Staffing of the Situation Unit: Inexperience with ICS resulted in staffing issues within the situation unit. Guidance for the situation unit in the RIC/NIC and greater information flow is needed. The situational picture at the RIC/NIC (or JFO) was not consistent with that at the field level. The situation unit requirements need to be in alignment with staffing and skill sets. The Situation Unit at the RIC/NIC needs to be more robust.
- Liaison for Information Flow: Planning section is a critical element in the RIC/NIC. It must be staffed appropriately to a high work load. Planning at Unified Command (UC) must have clear communications channels and exchange with the Planning Section of the RIC/NIC. RIC/NIC should consider utilizing a liaison (from the RIC/NIC Commander) at Command Posts to facilitate information flow only.
- RIC/NIC Support: When a RIC/NIC (or JFO) has been stood up, the task of coordinating the mobilization/obtaining of cross border transport of critical assets may be taken over by the RIC/NIC (or JFO), provided the port asks for additional help. Once a RIC/NIC doctrine has been completed, the USCG should ensure alignment between the MEXUS Plan and RIC/NIC (or JFO) Instruction.
- RIC/NIC JIC: Clear expectations of the JIC should be stated as soon as possible. Information flow between all JICs (RIC/NIC, UC) should be consistent. Guidance for the RIC/NIC roles and authorities is needed. Clarification of public information/risk communication responsibilities between RIC/NIC JIC and field-level UCs needs to be established.
- Salvage: Los Angeles/Long Beach (LA/LB) command posts developed a salvage plan in consultation with stakeholders that was approved by the NIC. NIC analyzed strategic port of refuge issues. This coordination effort should be captured in the guidance document of the tactical versus strategic decision making and NIC authorities.

5.2.3.1.2 On-Scene JIC Issues

The JIC was successfully included in operations to coordinate media coverage (i.e., obtained special high visibility operations and events). However, there were several JIC issues identified at all levels of play:

- Fostering Public Confidence: The RIC/NIC JIC never fostered public confidence as a response goal, which is an important responsibility in communicating to stakeholders across all levels and locations.

- Releasing Information to the Public: The RIC/NIC JIC slowed the UC's ability to communicate with the public by freezing the authority to release any information to the public, mainly in the form of press releases, and holding that authority purely at the RIC/NIC level. This issue needs to be addressed in the RIC/NIC and JFO JIC policies.
- Delayed Press Release: A press release detailing the explosion of the T/V Mariner was not released by the JIC for almost eight hours after the initial incident. Realistically, the On-scene Coordinator, State or RP would not allow that much time to pass due to concern for public health and safety and the potential damage to image and credibility. With the formation of the JIC at the NIC along with guidance that the ports could not release information at that time, all normal JIC duties were taken from the local ports and the process of releasing information grew too cumbersome for the NIC JIC to handle. Later, limited responsibilities were shifted back to the ports. This process was confusing to all parties, including the media role players, who were told to call the NIC JIC for information and then directed back to the ports. There was confusion over whether DHS needed to approve the releases, and if so, who at DHS needed to approve and authorize the press releases.
- Local Press Releases: The field command posts did not have the authority to release their own press statements. They had to send their draft statements to the RIC/NIC and wait for the RIC/NIC to officially release them. Information submitted to the NIC JIC was edited and lost integrity and important details in the process. The authority to release press statements, especially statements including public health information, needs to be at the local level so that information can be released to the media and the public in a timely manner.

5.2.3.2 *Recommendations*

A working group that includes the RRT and industry should be convened to align RIC/NIC (or JFO) management processes with the NRP JFO organization and involve the RRTs, including this in the Regional Contingency Plans (RCPs). Roles, responsibilities, and authorities should be clearly defined.

Policies and procedures need to be developed that recognize the professional leadership and ability of emergency response management personnel at the local level, and the need for local management of much of the local media message and transmission. Policies should consider an approach where information security as it relates to public speaking/media is a required part of training for on-scene managers. The procedures should ensure any national-level messages or critical information that needs to be considered is passed to the local media control point, vice the present approach where control is performed at too high of a level and thus slows down vital and time sensitive communication to media/public.

5.2.3.3 *Improvement Actions*

Guidance (i.e., an instructional template) should be developed to initiate the standard base for all parties. An instruction should be created to address staffing requirements and JIC guidance. This would override the current SONS Instruction.

5.2.3.4 *Responsible Organization*

USCG in coordination with NRT/RRT, DHS, and EPA.

5.2.4 Dispersant Procedures

5.2.4.1 *Observation*

No clear guidance or discussion on the use of dispersants within three miles of the U.S./Mexico border exists in the current MEXUS Plan. The GOM would like to be included in the decision regarding whether the U.S. FOSC can use dispersants on the U.S. side of the border, when the dispersed oil plume would inevitably impact Mexican waters. This raises the issue of national sovereignty.

5.2.4.2 *Recommendation*

Procedures and guidelines on dispersants use should be developed.

5.2.4.3 *Improvement Action*

The JRT should convene a working group consisting of USCG, Mexican Navy, U.S. DOS, and the Mexican DOS to develop dispersant use procedures along the U.S./Mexico border. Such guidelines would likely impact the Gulf Coast, as well as waters between U.S. and Canada, Russia, Oceania, and the Caribbean nations.

5.2.4.4 *Responsible Organizations/Time frame*

RRT 9, Pacific JRT, USCG (G-MOR, PAC Area, LAN Area), Mexican Navy, DOS, /To be developed under auspices of the Pacific JRT prior to 2006.

5.3 Planning

Emergency management involves the development of several kinds of plans: strategic plans that set the overall program course and direction; emergency operations/response plans that focus on the mechanisms for activating the organization and its assets during an actual operation; mitigation plans that focus on land use planning and the prevention and reduction of the impacts of hazards; and recovery plans that guide the organization through restoration of services, facilities, and functions following a disaster event.

5.3.1 Clarification on Roles and Responsibilities in the National Response Plan

5.3.1.1 Observation

The Initial National Response Plan (INRP) does not include details on the descriptions, roles, and responsibilities for the Principal Federal Official (PFO) and the relationship between the IIMG and the NRT.

5.3.1.2 Recommendations

The Hazardous Materials Annex to the National Response Plan (NRP) (to be published by the end of 2004) should define the relationship between the PFO, IIMG, and NRT for an oil spill response and hazardous materials incident. In addition to listing the IIMG member agencies, the NRP should include an NRT member as a liaison to the IIMG. This liaison would participate at the IIMG cell, as appropriate, for an incident involving activities related to NRT responsibilities and ensure the coordination between activities of the NRT and IIMG. The NRT Chair and Co-Chair would also determine the appropriate individual(s) to be the NRT liaison based on the specific incident. In turn, NRT membership should include DHS at the integration staff level.

5.3.1.3 Improvement Action

USCG will convene the NRP Working Group Writing Team to ensure the Hazardous Materials Annex to the NRP includes the relationship description between the PFO, IIMG, and NRT roles in an oil spill response and hazardous materials incident.

5.3.1.4 Responsible Organizations/Time frame

NRT in coordination with DHS / September 2004

5.3.2 Area Contingency Plan (ACP) Shortfalls for Emergency Operations

5.3.2.1 Observations

The current ACP guidance does not include the following:

- An Endangered Species Act wildlife checklist
- Historical properties guidance
- Salvage and lightering consideration document for notifications, and resource identification for commanders
- Essential Fish Habitat for response planning
- Waste management plan updates (periodically validated by state and local Resource Conservation and Recovery Act (RCRA) officials provided that storage and transportation rules change often; RCRA laws vary by region)

5.3.2.1 Recommendation

The NRT and USCG in cooperation with applicable agencies will prepare guidance to address the gaps listed above.

5.3.2.2 *Improvement Action*

Guidance documents for ACPs and RCPs will be created and designed to detail the considerations involved in the decision process with regards to the topics above. Region 9 RCP 2005 revision will contain this required information. Local 2005 ACP revisions will reference the content of the RRT9 RCP is scheduled for July 2005, the same date for the California Coastal ACP. This effort should be completed prior to the next ACP major revision due date.

5.3.2.3 *Responsible Organizations/Time frame*

Lead: NRT and USCG in coordination with RRT 9, Department of the Interior (DOI), and NOAA/ June 2005.

5.3.3 *Update the Incident Management Handbook (IMH) and National Response Plan*

5.3.3.1 *Observations*

New expectations placed on the ICS structure by the RIC/NIC should be covered by the IMH (e.g., the 209 Sit Stat report required by the RIC/NIC). The IMH should also include additional guidance on how to produce an Incident Action Plan (along with general guidance and the timeframe required to create an Incident Action Plan) that can be updated to include recent lessons learned and how to be in alignment with the NRP and the National Incident Management System (NIMS).

5.3.3.2 *Recommendations*

Update the IMH to reflect NRP/NIMS and RIC/NIC to JFO guidance (to be created). Coordinate with RIC/NIC Instruction (or JFO) working group and the Information Management Applications working group. (Recommended in Section 5.2.2.2).

5.3.3.3 *Improvement Action*

Publish the updated IMH.

5.3.3.4 *Responsible Organizations*

USCG in coordination with NRS agencies contingent upon completion of working group guidance documents.

5.3.4 *Port of Safe Refuge in the International Maritime Organization (IMO) Guidelines*

5.3.4.1 *Observations*

The port of safe refuge decision has regional and national implications. The National Incident Command organization included senior state and industry officials, which validated the decisions made and fostered senior stakeholder outreach. IMO guidelines were used to make better and faster decisions.

5.3.4.2 Recommendation

Continue refinement at the local and regional levels, taking into considerations the IMO guidelines.

5.3.4.3 Improvement Action

Capture IMO guidelines in the appropriate plans. Identify a lead for each plan.

5.3.4.4 Responsible Organizations/Time frame

USCG in coordination with RRTs, state, and industry/Fiscal Year 2005 (Refer to reporting requirements for IMO conference).

5.4 Direction, Control, and Coordination

During the pre- and post-incident phases of emergency responses, direction, control, and coordination allow officials to analyze the situation and decide how to quickly and effectively respond, direct and coordinate response forces, coordinate with other jurisdictions, and use available resources efficiently and effectively.

5.4.1 IIMG/NRT Coordination

5.4.1.1 Observations

The IIMG is an executive-level coordination team in Washington, DC. The NRT is a planning, policy, and coordinating body (located in DC) that provides technical expertise and policy guidance to the Regional Response Team and National Response System as a whole and shares information with government and non-government organizations relative to an incident. Below are IIMG/NRT coordination issues that arose during the exercise:

- IIMG and NRT's coordination roles and responsibilities were not clear between the two groups. The process for developing and implementing the roles and coordination needs to be established and exercised.
- A process for developing a consistent national message between the two groups was not in place.
- The IIMG did not have the interagency representation to address issues adequately. The IIMG should be made up of representatives of all Federal departments and agencies. The current approach does not allow individual departments and agencies to assess emerging situations and make determinations of authority, jurisdiction, interest, or the need to add capability to a response.
- Because the IIMG did not have the situational picture and the institutional knowledge associated with this type of a response, the IIMG seemed better suited for higher-level coordination between departments and agencies than for support to the on-scene response. The NRT was able to address complex issues unique to an oil or hazardous materials release, and as a result,

provided immediate support to the RRT/FOSC without the need for a comprehensive situational brief or background information.

- While the EPA and USCG will also have agency-specific IIMG representatives who are notified of the IIMG activation, those individuals are required to report promptly to the IIMG cell and may or may not have time to ensure NRT notification. It would be preferable for the NRT Chair/Vice Chair to receive direct notification of the IIMG activation as well.

5.4.1.2 Recommendations

An incident-specific IIMG for oil and hazardous materials incidents should be designated. Representation on the IIMG should include NRT-specific liaison. NRP IIMG Support Annex should specifically state that when the IIMG is activated for an incident involving a National Contingency Plan or Emergency Support Function #10 response, DHS should notify the NRT Chair and Co-Chair of the IIMG activation. The appropriate DHS components should have representation on the NRT to address IIMG coordination policy issues.

5.4.1.3 Improvement Actions

NRP, IIMG standard operating procedures, and NCP should reflect recommendations.

5.4.1.4 Responsible Organization/Time frame

DHS and NRT/September 2004 (prior to NRP publication date).

5.4.2 Interactions Between the NIC and PFO Staffs

5.4.2.1 Observations

The NIC provided strategic oversight, managed critical resources, and took the burden of political/public communication off of the Incident Commanders in the UCs. The PFO staff, in discussion, saw a very similar role for themselves. For this type of incident, the PFO support staff needs to organize and support the NIC and/or PFO. The following are examples of the NIC/PFO redundancies:

- PFO Staff Tasking NIC Staff: NIC staff received tasks from PFO cell staff and the NIC UC, increasing the streams of direction from above. PFO staff did not follow ICS/NIMS management principles.
- Duplication of Staff: Role of PFO staff was duplicative of NIC staff, and neither group could point to a well articulated distinction between PFO and NIC roles.
- PFO Organization Chart: There was no organization chart for how the PFO support staff and Deputy fit into the NIC or JFO organization. This caused significant confusion amongst those in the NIC organization.
- NIC as the PFO: For this exercise, the NIC was also assigned as the PFO resulting in several issues regarding the duplication of efforts. Had the

SONS scenario involved a terrorism element, dual hatting might have proved more difficult.

5.4.2.2 Recommendations

The roles and responsibilities for the PFO staff and the NIC staff need to be clarified and the coordination process between the staffs should be established in accordance with NIMS. Decision criteria should be clearly articulated over which issues are handled by the PFO staff versus the NIC staff. PFO support staff should be solely focused on agency liaison back to Washington, DC and in some cases, to the regions.

5.4.2.3 Improvement Action

PFO staff standard operating procedures should clearly define their roles and responsibilities within JFO operations, and function in the context of ICS components. RIC/NIC (or JFO) Instruction needs to clearly address coordination with the PFO (as recommended in 5.2.3.2.)

5.4.2.4 Responsible Organization

DHS Integration Staff in coordination with USCG.

5.5 Communications and Warning

The Communications and Warning program element involves establishing, using, maintaining, augmenting, and providing backup for all types of communications devices required in day-to-day emergency operations. Warning comprises the dissemination to government officials and the public of timely forecasts of all hazards requiring emergency response actions.

5.5.1 NRC and NRT Notification and Information Sharing

5.5.1.1 Observations

Issues concerning notification procedures during the exercise are as follows:

- National Response Center (NRC) Notification Protocol: Several NRT members did not receive a telephone call from the NRC. The Incident Call-Down list should be updated and tested on a regular basis. In addition, the National Response Center's notification protocol for NRT activation should be reviewed.
- Information Sharing with NRT/ RRT: During the exercise, NRT members did not receive readily available information that was needed to perform their work. In most large-scale incidents, it is important that people other than those on-scene or in the Command Posts, such as Natural Resource Trustees, have immediate access to incident information.

5.5.1.2 Recommendations

The information management applications work group should provide general guidance on information expectations with respect to timing. In addition, the NRT should resolve notification information sharing issues with the NRC.

5.5.1.3 Improvement Action

The NRT operations manual will address the relationship and coordination procedures with the NRC.

5.5.1.4 Responsible Organization

NRT.

5.6 Operations and Procedures

Development, coordination, and implementation of operational plans and procedures are fundamental to an effective disaster response and recovery. Standard operating procedures and checklists provide the detailed instructions that an organization needs to fulfill responsibilities assigned in the emergency operations plan.

5.6.1 Salvage Capabilities

5.6.1.1 Observations

Salvage capabilities were adequate for the scenario. However, if the scenario had been more complicated, capabilities may have proven inadequate. Guidance does include consideration for salvage operations; however, ACPs do not adequately address salvage capabilities.

5.6.1.2 Recommendation

Current salvage capabilities should be reviewed and exercised. ACPs should enhance their salvage guidance.

5.6.1.3 Improvement Action

ACPs will be updated and exercised. USCG will promulgate salvage regulations.

5.6.1.4 Responsible Organization

USCG, American Petroleum Institute, American Salvage Association.

5.6.2 Dispersant Use Decision

5.6.2.1 Observation

There is typically a short window of opportunity to use dispersants on an oil spill in open water. Having pre-approved zones proved efficient and allowed FOSCs to perform dispersant applications quickly. State waters (<3 nautical miles) require RRT approval prior to dispersant application.

5.6.2.2 Recommendation

Consider developing pre-approval zones throughout the nation where they do not currently exist. Currently, RRT 9 is completing the pre-approval zones for federal waters off the coast of California.

5.6.2.3 Improvement Action

USCG, in coordination with RRTs should develop pre-approval zones for all coastal zones.

5.6.2.4 Responsible Organization

USCG in coordination with RRTs.

5.7 Training and Research

The Training and Research program element involves the assessment, development, and implementation of training and educational programs for public and private officials and emergency response personnel.

5.7.1 ICS Training

5.7.1.1 Observations

Basic understanding of the ICS management process by the players at all levels was inadequate. Over the years, the USCG, along with other response organizations, has lost a lot of their ICS expertise. The general impression was that ICS training levels are sub marginal across most of the organizations present. Many exercise participants lacked basic ICS knowledge. In addition, many players did not understand how the RIC/NIC fit into the ICS structure. All players should receive training on ICS that includes the RIC/NIC's (or JFO's) role in incident response.

5.7.1.2 Recommendations

The training and exercise program should go beyond individual, class-room training and be regularly exercised by the teams. ICS training and evaluation needs to be standardized (training, certification, and regular use) and should be a recurring program. A standard measure of success or evaluation should be developed.

5.7.1.3 Improvement Actions

All National Response System (NRS) organizations will work interdependently to develop policies/protocols to ensure ICS operations are institutionalized within their organizations as mandated by NIMS. A standard for measuring success of an ICS organization should be developed.

5.7.1.4 *Responsible Organizations*

NIMS Center in coordination with states and industry.

5.7.2 Knowledge of Salvage and Cleanup Operations

5.7.2.1 *Observations*

Oil spill response personnel did not appear to have even a basic knowledge of the equipment required to support salvage or spill cleanup operations. Because of mission-focus changes, there is a continual need to replenish expertise in core missions.

There was a shortage of personnel with experience to fill key positions. Many middle-level spill management staff had never worked a large spill and some had never been involved in an exercise. As a result, some issues and complex processes unique to spill response were not effectively addressed.

5.7.2.2 *Recommendation*

Increase response cleanup training in addition to ICS training. Response organizations should balance training with missions.

5.7.2.3 *Improvement Action*

More resources should be put into developing the oil spill and hazmat response expertise of all response organizations.

5.7.2.4 *Responsible Organizations*

USCG, industry, states.

5.8 Finance and Administration

In addition to having sound financial and administrative procedures for daily operations, it is equally important to have procedures in place to ensure that fiscal decisions can be expedited in accordance with established authority levels and accounting principles. These procedures should include establishing and defining the responsibilities for the program finance authority, program procurement procedures, payroll, and accounting systems to track and document costs.

5.8.1 *Funding of a SONS*

5.8.1.1 *Observations*

The cost of responding to a SONS can exceed the Oil Spill Liability Trust Fund's (OSLTF's) annual appropriation for incident response, which, in turn, can disrupt the response. The OSLTF is a billion dollar fund, but the majority is reserved for natural resource damage restoration and claims. The emergency

response portion of the fund accounts for merely \$50 million. The cost of responding to a SONS could easily exceed this amount, in which case the National Pollution Fund Center would have to ask Congress for an emergency supplemental appropriation. If this supplemental cannot be enacted quickly, disruptions to the response may occur.

5.8.1.2 Recommendation

The Emergency Fund should be increased.

5.8.1.3 Improvement Action

Congress should raise the Emergency Fund.

5.8.1.4 Responsible Organization

National Pollution Fund Center.

5.8.2 Multiple Financial Tracking Systems

5.8.2.1 Observations

More than one Financial Tracking System was being used within the Finance Section in at least one port Command Post. The documentation of resource utilization may not have been sufficiently adequate to support a subsequent incident (e.g., time decisions taken, time of start/finish for various activities.)

5.8.2.2 Recommendations

While all participating organizations are utilizing the Incident Command System and Incident Action Plan systems and processes, multiple financial tracking systems are being used. Multiple systems must be used as all responders have different accounting systems and the information must be captured in their individual systems. However, the Finance Section Chief needs a system (or process) to integrate the information from the various systems together at the event so they have an accurate picture of the finances.

5.8.2.3 Improvement Action

Incident Management Applications Work Group will evaluate ways to integrate financial information from various systems.

5.8.2.4 Responsible Organization

USCG, industry, states.

5.8.3 Funding Sources for International Response Operations

5.8.3.1 Observations

The OSLTF does not fund response operations outside the U.S. even if the oil originates in U.S. waters from a non-government source. In addition, the MEXUS Plan does not discuss alternative oil spill response funding sources.

5.8.3.2 Recommendations

Alternative funding sources available to assist with international oil spill response operations should be identified in the MEXUS Plan. This plan should discuss how and when to access these funding sources. This should also be considered for plans with other international partners.

5.8.3.4 Improvement Action

USCG will update the MEXUS Plan to identify and describe alternative funding sources for oil spill response operations outside of the U.S.

5.8.3.5 Responsible Organization

USCG (G-MOR, PAC Area, LAN Area.)

6

CONCLUSION

The California Spill of National Significance (SONS) 2004 exercise was the largest National Response System exercise to date. The exercise was a first for (1) testing the Initial National Response Plan and National Incident Management System; (2) integrating an international component into a SONS exercise; and (3) including a consortium of petroleum companies in the planning and exercising efforts of a SONS. This exercise not only met the six major objectives (listed in section 3.1) agreed upon by the exercise sponsors, it achieved the SONS Program goals by:

- Increasing national preparedness for a SONS by engaging all levels of spill management in a coordinated response.
- Improving the ability of the National Incident Command organization to manage a SONS.
- Ensuring senior agency officials and law makers are aware of their role in a SONS response.

The exercise validated that the decision making processes for both contingency planning and during an emergency response used by the National Response System is an excellent approach to improving preparedness and making the best response decisions. The strength of this system is in part based on the processes used that involve ongoing consultations with the response stakeholders at the local, regional, and national levels.

The exercise also allowed for the identification of expectations and problem areas that need to be resolved before the next incident of national significance. Twenty-two issues with national level implications were identified. The SONS planning and coordination team recommended corrective actions for each of these issues. (The SONS planning and coordination team contact information is listed in Appendix 5.) At the beginning of this report, the sponsors agreed in a signed message that the California SONS 2004 exercise achieved the objectives and improved the skills and experience of response organizations. Although this exercise met the SONS Program goals and the six major objectives, the success of this exercise will depend on the resolution of those 22 issues prior to an incident and the next SONS exercise. The U.S. Coast Guard, in coordination with the National Response System organizations, has committed to resolving these issues in fiscal year 2005, prior to the planning for the 2007 SONS exercise.

The exchange of ideas and information among various agencies at different levels allowed participants to gain a better understanding of the authorities, jurisdictions, roles

and responsibilities of other groups. The exercise provided continued education of emergency management personnel and elected officials regarding requirements for intergovernmental coordination between emergency management and other appropriate organizations. The exercise also facilitated the building and strengthening of partnerships among participants.

Finally, the exercise provided participants a venue for high-level thinking and a rare opportunity to have many of the involved agencies and governments present to confront the issues of mutual concern. The California SONS 2004 exercise set the stage for future cooperative efforts and exercises.

APPENDIX

1

PARTICIPATING ORGANIZATIONS*

A

Aduana Ensenada
Aduana Tijuana
Advanced Cleanup Technologies, Inc.
Alaska Tanker Company
Aramco Services Company
Armada de Mexico
AT&T

B

Blue Water & Associates, Inc.
Bomberos Y Proteccion Civil
Booz Allen Hamilton
British Columbia State Marine Pollution Control, Salvage Administration
British Columbia State Marine Pollution Control, Salvage & Rescue
British Petroleum (BP)

C

California Coastal Commission
California Conservation Corps
California Department of Boating and Waterways
California Department of Conservation, Division of Oil and Gas
California Department of Finance
California Department of Fish & Game, Office of Spill Prevention and Response
California Department of Forestry & Fire Protection
California Governor's Office of Emergency Services
California Maritime Academy
California Military Department
California National Guard
California Occupational Safety & Health Administration
California State Fire Marshal, Office of Pipeline Safety
California State Lands Commission
Capitana de Puerto

Capitana Rosarito
ChevronTexaco Corporation
Cicese
Clean Coastal Waters, Inc.
Clean Islands Council
Clean Rivers Cooperative, Inc.
Clean Seas, LLC.
COFREPIS-SSA
Comision Nacional del Agua (CONAQUA)
COM THIRD FLEET
ConocoPhillips
Crawford & Company
Crowley Marine Services, Inc.

E

East Asia Response Pte Ltd
Emergency Aerial Dispersant Consortium
Emergency Management Services International, Inc.
ENTRIX, Inc.
ExxonMobil Corporation

F

Federal Bureau of Investigation
Federal Emergency Management Agency
Fleet and Industrial Supply Center, San Diego
FOSS Maritime

G

Genwest Systems, Inc

H

Heal the Bay
Herbert Engineering Corp.
Hudson Marine Management Services

I

IBM Corporation
Instituto de Servicios de Salud en el Estado de Baja California (ISESALUD)
Instituto Nacional De Inmigracion

International Tanker Owners Pollution Federation Limited

J

J.C. Environmental Co. Inc.
Jacobsen Pilot Service, Inc.

K

Keesal, Young & Logan

L

Los Angeles Regional Water Quality Control Board

M

Marathon Oil Corporation
Marine Spill Response Corporation
Medical Emergency Dynamics
The McCloskey Group, Inc.

N

The National Center for Crisis and Continuity Coordination (NC4)
National Oceanic and Atmospheric Administration
National Park Service, Cabrillo National Monument
National Weather Service
Naval Weapons Station, Seal Beach, California
New Zealand Maritime Safety Authority

O

The O'Brien Group
Ocean Integrated Solution
Ocean Studies Board of the National Academies
Orange County Coastkeeper
Orange County Sheriffs Department, Harbor Division
Oregon Department of Environmental Quality

P

The Pacific States and British Columbia Oil Spill Task Force

PEMEX

Perot Systems Government Services

Petrolera Ameriven

Petrozuata (COP Joint Venture)

Plains Exploration & Production Company

PMI Comercio Internacional, SA de CV

Polar Tankers, Inc.

Polaris Applied Sciences, Inc.

Procuraduría Federal de Protección al Ambiente (PROFEPA)

Proteccion Civil

Proteccion Civil De Rosarito

R

Reg. Sanitata SSA

The Response Group

S

Sanavens

San Diego Baykeeper

San Diego County, Department of Environmental Health

San Diego County, Harbor Police Department

San Diego County, Health and Human Services Agency

San Diego County, Office of Emergency Services

San Diego County, Office of Emergency Services

San Francisco Bay Conservation and Development Commission

Santa Rosa Island Authority Marina

Scripps Institution of Oceanography

Sct. Capitana, Ensenada

Secretaria de Agricultura, Ganaderia, Desarrollo Rural, Pesca, Y Alimentacion,

Conapesca

Secretaria de Gobierno

Secretaria de Marina

Secretaria Marina Arm (HUMBOLDT)

Secretaria Marina ZN-2

Secretaria de Medio, Ambiente y Recursos Naturales

Semar/Armada de Mexico

Shell Oil Products US

SRA International, Inc.

Subsecretaria de Gobierno

T

Texas General Land Office

Thomas Miller Insurance Services, Ltd.
Titan Maritime LLC
TracTide Marine Corp.

U

United Kingdom Maritime and Coast Guard Agency, Marine Pollution Control/Marine Response Alliance

Universidad Autonoma de Baja California, Facultad De Ciencias Marinas

Universidad Autonoma de Baja California, Instituto Invs. Oceanologicas

University of California, Davis, Oiled Wildlife Care Network

University of California, Davis, Wildlife Health Center

URS Corporation

U.S. Army

U.S. Coast Guard

U.S. Coast Guard Auxiliary

U.S. Customs & Border Protection

U.S. Department of Agriculture, U.S. Forest Service

U.S. Department of Homeland Security

U.S. Department of the Interior, National Park Service

U.S. Department of the Interior, U.S. Fish and Wildlife Service

U.S. Department of the Interior, Bureau of Land Management, Minerals Management Service

U.S. Department of Transportation, Research and Special Programs Administration, Office of Pipeline Safety

U.S. Environmental Protection Agency

U.S. General Services Administration

U.S. Department of Labor, Occupational Health and Safety Administration

U.S. Navy

U.S. Northern Command

V

Vopak North America, Terminals West Coast

W

Washington State Department of Ecology

WWERT

* *Note: Mexican organizations are italicized.*

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APPENDIX 2 SONS PROGRESSION CHART

Issue	1997 SONS, Philadelphia, PA	1998 SONS, Valdez, AK	2002 SONS Gulf	California SONS 2004	Proposed Objectives for SONS 2007
Jones Act Waivers During Response	Included in exercise design, but no recommendations included.	Included in exercise design, but no recommendations included.	Recommend MOA between USCG and customs for non-defense waivers during response.	Which agency (ies) has responsibility for Jones Act enforcement should be clarified.	Test emergency waiver authority after an MOA is completed. Ensure the responsible agency is involved in the exercise.
NRT/NIC Relationship	Included in exercise design, but no recommendations included.	The role of each organization (HQ, NRT, RRT, and NIC) in relation to the others needs to be defined.	The NRT should expand the NCP to clarify the roles and responsibilities and organizational relationships of the NIC.	A working group that includes RRT and Industry should be convened to align RIC/NIC management processes with the NRP JFO organization.	Test the doctrine as an objective of the exercise.
In Situ Testing and Research	Not considered.	Recommend the NRT develop a protocol to address set-aside of impacted areas for scientific research.	The NRT should help to change in-situ testing prohibitions & develop a protocol for conducting <i>in situ</i> R&D during spills.	Not considered.	If available, national test protocols should be tested.
NIC Finance Role	The NIC must track costs and provide to HQ, including RP's liability ceiling.	NIC Finance Section, rather than District should deal w/ NPFC in ceiling management.	NPFC incorporated as part of NIC Finance Section.	NPFC was part of the NIC Finance Section. Integration was successful.	N/A
OSLTF Shortfall	Contingency legislation is required for shortfall of emergency funds.	Not considered.	Submit legislative change proposals to raise the \$1 billion incident limit, increase the emergency fund and make the principal fund larger.	Submit legislative change proposals to increase the emergency fund and make the principal fund larger.	Track legislative changes and test in exercise.
NRT Role in Public Information	NRT will establish a web site to keep public informed.	Not considered.	NRT agrees to develop protocol for sharing situational awareness w/ agency heads to ensure consistency w/ NIC public info.	NRT should develop protocols for sharing information with other agencies, including the IIMG. Recommend that the NOAA website be the primary source for distributing public information.	Should be tested during exercise for accuracy and timeliness.
NIC Role in Public Information	NIC will act as central media hub & conduct 3-4 press conferences per day.	There should be only one JIC with "Branch Offices." But, there was disagreement as to where the central and branch JICs should be located.	Incorporate lessons learned into a comprehensive plan for managing and coordinating public information with a NIC Standard Operating Procedures Manual.	Procedures and protocols should be developed to address the JIC at local, regional and NIC (or JFO) /SFO levels.	Test the interaction between NIC (or JFO)/SFO, RIC, and Port JICs to ensure each clearly understands their roles and responsibilities during a SONS.
Proprietary Information	Not considered.	Establish a joint system or electronic links between participating organizations to efficiently share timely information while maintaining proprietary and confidential information.	The NRT should develop guidelines to assist FOSCs to prevent proprietary information from being released while communicating with stakeholders.	Not Considered. Agency EOCs should develop guidelines for using conference room spaces adjacent to or within their secure areas by other agency members that do not maintain security clearances.	Test procedures for using conference room spaces adjacent to or within secure EOC spaces by agency members that do not maintain security clearances.

Issue	1997 SONS, Philadelphia, PA	1998 SONS, Valdez, AK	2002 SONS Gulf	California SONS 2004	Proposed Objectives for SONS 2007
National Unified Command	The concerns of the states & RPs must be addressed as they may not have the resources to staff multiple command centers around the clock.	The CMT/NIC was comprised of executives and officers of BP, ADEC and USCG.	The USCG should establish a NUC as a best practice to support a NIC and key stakeholders.	A National Unified Command was established that included Mexico liaisons. At the time of the exercise the NRP JFO was not fully vetted. A NIC (or JFO)/SFO instruction should be developed that clearly defines the roles and responsibilities at the NIC/SFO level of coordination.	Test the JFO structure based on the NRP and any existing instructions.
NIC Communications with Washington DC	NIC must establish a communications schedule with HQ.	The video teleconferences with Washington officials were very effective in communicating incident status.	An internal communications process should be incorporated into the NIC SOP manual.	A Situation Unit at CGHQ was established that captured situational and resource info from the NIC and passed it to the HSOC. This process needs to be refined and agency info requirements need to be established. The communications process needs to be refined and included as part of the NIC (or JFO)/SFO instruction.	Test the NIC (or JFO)/SFO communications process with Washington D.C.
NIC Decision Making Process	Not considered.	Prioritizing issues would have been done better in an integrated organization to take full advantage of subject experts and the benefit of different perspectives.	The USCG should develop a risk-based decision making tool for establishing strategic objectives and priorities.	Not considered.	N/A
Information Sharing with NRT	Must determine the best method for communicating with the NRT.	Assigning an NRT liaison to USCG Headquarters Incident Management Cell improved the flow of information between the NRT and USCG.	Not considered.	The NRT should develop an operations manual to address their relationship, notification information sharing process, and coordination with the NRC.	Test the NRT operations manual as a supporting exercise objective.
Situational Awareness in the Washington DC Area	Information coordination would eventually evolve to USCG HQ, who will form a JIC to coordinate info flow between the NIC and the White House.	The exercise web page was also effective in communicating with stakeholders.	The NRT should develop a protocol for communicating and sharing a common situational picture amongst the highest levels of federal agencies in Washington, D.C., which includes an information-technology solution to widely communicate spill information from the NIC.	Information management needs, such as type, process for collection, dissemination, and timing should be defined for all levels. Tools, job aids, and guidance should be developed to define informational needs at all levels by the NRT and IIMG in coordination with RRTs and DHS.	The tools, job aids, and guidance should be tested by the exercise if developed.
OSRO Mutual Aid	Not considered.	OSROs did not seem to know the level below which they could release mutual aid resources, so as not to violate facility and vessel response plan requirements.	The USCG and EPA should introduce new rules requiring plan holders to report changes in readiness status due to changes in the availability of owned or contracted response resources to their cognizant FOSC.	There are existing protocols for this. Issue does not warrant legislative action. Rather, focus efforts on upgrading the Response Resource Inventory.	If completed, evaluate RRI database for accuracy.
NIC Concept of Operations	Not considered.	The CMT/NIC should have a high level strategic plan that provides both guidance and support to the General Plan, as well as common issues and actions for the NIC.	The USCG should incorporate specifics on how a NIC should manage the strategic oversight of a SONS response into a standard operating procedures manual.	A RIC, NIC (or JFO)/SFO instructional doctrine should be developed that details the roles, responsibilities, and composition of the RIC, NIC/SFO (or JFO). SOPs developed to implement the plan.	Test RIC, NIC (or JFO)/SFO doctrine as an exercise objective.

Issue	1997 SONS, Philadelphia, PA	1998 SONS, Valdez, AK	2002 SONS Gulf	California SONS 2004	Proposed Objectives for SONS 2007
NCP and FRP Integration (Starting with SONS 07, the FRP will be replaced by NRP)	Since states may press for disaster assistance declaration from FEMA, the USCG should have a plan in place to deal with this scenario.	Not considered.	The NRT should work with FEMA to define the relationship between the NIC, the FCO and the ESF #10 regional chair.	The NRP now serves as the overall national coordination plan for all hazards. The USCG should convene the NRP Working Group Writing Team to ensure the Hazardous Material Annex to the NRP includes the relationship description between the PFO, IIMG, RRT, and NRT roles in an oil spill or hazardous materials incident.	Test the coordination of the NRP components (PFO, IIMG, and JFO) with the NCP (NRT, RRT, NRC, RIC, NIC (or JFO)/SFO, and FOSC).
Contracting Authority	There is a need for a procurement law specialist to focus on the procurement law issues arising in the Finance Section of the IAC [NIC] or other contracting activity needed when responding to the discharge.	Not considered.	Submit a legislative change proposal (LCP) to provide the FOSC and the NIC with the legal authority to direct competing response resources, which may include the assumption of the contract between the response contractor and the potential or actual RP.	CWA authorities are broad enough to give FOSCs authority over RP resources, however there is no penalty for non-compliance. A USCG NIC (or JFO) does not possess FOSC authorities, but can direct an FOSC.	Ensure contracting authorities under the NRP and subsequent USCG policy documents are tested.
Homeland Security Implications	Not considered.	Not considered.	Public and private plan holders need to assess the overall impacts on spill response readiness caused by the changes due to homeland security and incorporate into appropriate contingency plans.	Update the Incident Management Handbook and any other pertinent instructions to reflect NRP/NIMS and the NIC (or JFO)/SFO guidance (to be created – see above).	Test any new or revised plans as part of the exercise.
Expedited Cross-Border Exchange of Response Resources	Not considered.	Not considered.	Not considered.	Recommend revising the joint plans to include procedures for transporting resources across borders.	Work with an international partner to test cross border exchange of response resources during the exercise and any plan changes or enhancements.
Cross Border Waste Disposal	Not considered.	Not considered.	Not considered.	Develop guidelines and procedures for transporting hazardous waste across international borders.	Test any developed procedures.
Cross Border Wildlife	Not considered.	Not considered.	Not considered.	Develop guidelines for responding to contaminated wildlife and carcasses across international borders.	Test the guidelines during the exercise.
Dispersant Procedures	Not considered.	Not considered.	Not considered.	Develop dispersant use procedures for border areas between US and international waters.	Work with an international partner to test the procedures on a future exercise. SONS 07 is scheduled to occur in fresh water, therefore dispersants will probably not be considered.
ACP Enhancements	Not considered.	Not considered.	Not considered.	Create guidance documents for ACPs and RCPs that detail considerations and decision processes with regards to: the Endangered Species Act MOA; National Historic Properties guidance; salvage and lightering considerations; and Essential Fish Habitat for response planning	Test during the exercise.
IIMG/NRT Coordination	Not considered.	Not considered.	Not considered.	Designate an incident-specific IIMG for oil and hazmat incidents. The IIMG should include an NRT-specific liaison. The appropriate DHS components should also have representation on the NRT to address IIMG coordination policy issues.	IIMG participates in the exercise in a realistic manner.

Issue	1997 SONS, Philadelphia, PA	1998 SONS, Valdez, AK	2002 SONS Gulf	California SONS 2004	Proposed Objectives for SONS 2007
NIC (of JFO) and PFO Staff Interaction	Not considered.	Not considered.	Not considered.	Develop standard operating procedures to clearly define relationships, and roles and responsibilities of the RIC, NIC (or JFO)/SFO staff and the staff of the PFO.	Test the RIC, NIC (or JFO)/SFO and PFO operational procedures to ensure each staff works efficiently and there is no duplication of effort between the staffs.
ICS Training	Not considered.	Not considered.	Not considered.	Recommend all NRS organizations (including states and industry) work inter-dependently to develop policies and protocols to ensure ICS operations are institutionalized within their organizations as mandated by the NIMS. A standard for measuring success should be developed.	Test ICS knowledge and experience as part of the exercise. Ensure that using a common ICS management system is an objective.
Knowledge of Salvage and Cleanup Operations	Not considered.	Not considered.	Not considered.	Resources should be put towards developing necessary oil spill and hazmat response expertise, in the areas of cleanup and salvage operations.	Develop a scenario that will test cleanup and salvage operations to an oil spill or hazmat incident.
Funding Sources for International Response Operations	Not considered.	Not considered.	Not considered.	Identify alternative funding sources available to assist with oil and hazmat spill response operations when the oil or hazmat is located in international waters.	Ensure the appropriate partners are involved in the exercise so that alternative funding sources can be tested.
Salvage and Lightering Capabilities	Not considered.	Not considered.	Not considered.	By utilizing IMO guidelines, salvage and lightering capabilities were successfully tested for the given scenario. However, if the scenario had proven more difficult, capabilities may have been found insufficient to support the necessary response. ACPs should more clearly outline their salvage capabilities and operational guidelines.	Ensure there is a salvage component built into the scenario so this can be tested.

APPENDIX

3

EXECUTIVE SEMINAR AGENDA

Session One: Introductions and the National Response System

- 0930-1000 Opening Remarks
- Commandant of the U.S. Coast Guard Welcome ADM Tom Collins
 - Department of Homeland Security Remarks ADM James Loy,
(Ret), DHS
 - Introductions, Administration, and Seminar Process Ms. Kim Fletcher
 - Seminar Objectives RADM Tom Gilmour

Executive Seminar Objectives

Familiarize participants with the National Response System and seek agreement on our approach to SONS response. We will do this through familiarization and discussion of:

- Response Management Structure and System for SONS
- Impacts of the spill to public health, environment, and economy
- Information flow to our national leaders during a SONS
- Response issues (capabilities, funding, terrorism, international)

- 1000-1005 Scenario Briefing #1 (2 slides, 1 video news clip)
- 1005-1040 Response Management Structure and System for a SONS
- National Contingency Plan Ms. Debbie Dietrich, EPA
 - Initial National Response Plan/NIMS/NR Mr. Bob Stephan, DHS
 - SONS Response Management Organization CDR Ray Perry
- 1040-1100 Topics of Discussion
- Who is in charge of what and when?
 - What are the command, control, and communication interdependencies?
 - How is our capability to respond to pollution incidents enhanced with the integration of the National Contingency Plan with the National Response Plan and National Incident Management System?
- 1100-1110 Break

Session Two: Response Operations

- 1110-1115 Scenario Briefing #2 (2 slides, 2 video news clips)
- 1115-1145 Video Teleconference with National Incident Command/Unified Command
- Briefing of Incident Status, Implications, and Issues
 - VADM Terry Cross, USCG
 - RADM Carlton Moore (Ret), State OSC
 - Mr. Alex Walker, Industry
- 1145-1215 Topics of Discussion:
- How does the community prepare for an event this size and where might improvements be made?
 - What has changed in your response now that security is also a primary mission and concern during the incident?
 - Do you have the resources you need to protect environmentally sensitive areas, and what is your assessment of the impact on the environment?
- 1215-1245 Working Lunch

Session Three: SONS Technical Response and Response Operations Support

- 1245-1310 **Panel #1**
- Response Capabilities CAPT Joe Saboe, USCG
 - Environmental Impacts Mr. Bob Pavia, NOAA
 - Industry Perspectives Mr. Robin Rorick, API
- 1310-1330 Discussion on Panel # 1
- Seek input on the adequacy of our preparedness construct and capabilities for a major incident.
 - Validate that there remains a need for ongoing federal (CG) leadership at the local level in planning, preparedness and response to maritime accidents and pollution in our maritime areas.
- 1330-1340 Break
- 1340-1410 **Panel #2**
- Funding – Oil Spill Liability Trust Fund Ms. Jan Lane, NPFC
 - Public Affairs: Coordinating Media, Crisis Communications, and Risk Communications CDR John Philbin, USCG
 - Federal Bureau of Investigation – If this spill had been caused by terrorists, what would be different Mr. Christopher Combs, FBI

- 1410 – 1445 Discussion on Panel # 2
- Confirm that our readiness to respond to maritime accidents, and oil and hazardous materials releases is a critical component of our National Security
 - Confirm that the processes in place meet the information needs of our national leaders.
 - Does there exist appropriate relationships and mechanisms for cooperation and coordination between criminal investigations of terrorist acts in the U.S. and a SONS response.

Conclusion

1445-1500	The Way Ahead/Action Items	RADM Tom Gilmour
1500-1515	Closing Comments	ADM Thomas Collins

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APPENDIX

4

2003 NIC AND NATIONAL-LEVEL TRAINING TABLETOP EXERCISE ISSUES SUMMARY

This section highlights the issues raised during the NIC- and National-level Training Tabletop Exercises. It is a brief snapshot of issues that were expanded and reviewed to verify any implications on the California SONS 2004 exercise. These issues include:

- Role of the National Incident Commander
- Role of the Federal Bureau of Investigation
- Role of the Department of Homeland Security and the Principal Federal Official
- Role of the Responsible Party
- Role of the National Response Team/Regional Response Team
- Role of the Multi-Agency Committee in a SONS Response
- Role of the Media during a Terrorism Incident
- Immediate Situational Awareness at All Levels
- Government of Mexico Information Exchange/Use of Foreign Equipment
- Salvage/Port of Refuge
- Los Angeles/Long Beach Port Closure
- Security
- Funding a SONS.

Role of the National Incident Commander

Because the role of the NIC has never been implemented in an actual oil spill incident, the concept of the NIC needs to be conveyed to members outside the U.S. Coast Guard (USCG) community. Information on the purpose, roles, responsibilities, activation, and deactivation of the NIC should be shared among stakeholders. Other information, such as transitioning from a RIC to a NIC, information flow to and from the NIC, and decision-making processes for the reallocation of resources should be discussed. *This issue was raised in the NIC-level TTEX.*

Role of the Federal Bureau of Investigation

Clarification of how the Federal Bureau of Investigation (FBI) fits into the response organization is needed. The authority that determines who has authority (FBI or USCG) and when the authority is implemented needs to be addressed. In addition, the relationship between industry and FBI is not clear. Industry participants and FBI representatives discussed the notification process during an incident that may involve terrorism. Industry participants do not currently have a pre-established relationship with

FBI and would coordinate through USCG partners to correspond with FBI. In turn, FBI reported that not only would they coordinate directly with the USCG and the Captain of the Port, but they would contact industry for representation at their emergency operations center. Currently, the USCG is represented on the FBI task force for every field office and has established a notification process. FBI would work with USCG to get access to the crime scene as soon as possible to obtain all evidence possible, without interfering with the response. USCG participants extended an offer for FBI to attend response training on their boats and at their field units, an opportunity to educate the FBI on USCG response activities. *This issue was raised in the NIC- and National-level TTEXs.*

Role of the Department of Homeland Security and the Principal Federal Official

The role of the Department of Homeland Security (DHS) and/or the Principal Federal Official (PFO) in a SONS response organization and in a SONS incident involving terrorism is unclear. The relationship of the PFO to the (1) Federal on-Scene Coordinator (FOSC), (2) National Response Team (NRT)/Regional Response Team (RRT), (3) National Incident Command (NIC)/Regional Incident Command (RIC) and (4) Responsible Party should be defined. DHS should address information requirements, the notification process, liabilities of the PFO, funding of the PFO and his/her staff, and staffing the PFO position with a USCG flag officer. In addition, DHS needs to address the roles and responsibilities of the Interagency Incident Management Group (IIMG) in a SONS response and how the IIMG interacts with the National Response Team and the Federal Emergency Management Agency's (FEMA's) Catastrophic Disaster Response Group. *This issue was raised in the NIC- and National-level TTEXs.*

Role of the Responsible Party

Clarification is needed on the roles of the Responsible Party (RP) in the (1) Unified Command or National Incident Command during all phases of response, (2) the Joint Information Center (JIC) and in response to the media, (3) when there are multiple emergency operations centers (EOCs), and (4) when the incident involves terrorism. *This issue was raised in the NIC-level TTEX.*

Role of the National Response Team/Regional Response Team

The RIC/NIC and industry partners need a clearer understanding of the RIC/NIC. Information on the communication and coordination of efforts between the RIC/NIC and the NRT/RRT is needed. In addition, the RIC/NIC should clearly understand the resources and capabilities that the NRT/RRT provides. In addition, the relationship between industry and the NRT/RRT is not clear. *This issue was raised in the NIC- and National-level TTEXs.*

Role of the Multi-Agency Committee in a SONS Response

The role of the Multi-Agency Committee (MAC) during an oil spill response needs to be defined. The MAC is an independent, autonomous organization that can provide recommendations and concerns from local members of the MAC. It is an opportunity for the local stakeholders to express concerns to the State representative in the RIC/NIC. *This issue was raised in the NIC-level TTEX.*

Role of the Media for a Terrorism Incident

There is a need to educate the public and the media on a crisis communications strategy during incidents involving terrorism. The strategy should address the relationship with the press and the public. *This issue was raised in the National-level TTEX.*

Immediate Situational Awareness at All Levels

During a SONS response, the number of command centers and senior officials increases quickly resulting in the need to ensure situational information that is disseminated accurately and quickly without overburdening the FOSC. A description of the management of information and the information flow process to all of the various positions when there are a number of activated command centers is needed. Utilizing “chat rooms” as a means for immediate information sharing should be explored. For an incident involving terrorism, secure channels for communications should also be addressed. *This issue was raised in the NIC- and National-level TTEXs.*

Government of Mexico Information Exchange/Use of Foreign Equipment

In an incident that has international implications, the option of foreign representation at the NIC should be explored. For the California SONS 04 scenario, the planners will need to explore whether PEMEX, which is part of the Mexican Contingency Plan, will be represented in the NIC. Procedures for foreign communications need to be clarified. In addition, the legalities and liabilities for using foreign oil spill response resources in U.S. waters should be clarified. *This issue was raised in the NIC-level TTEX.*

Salvage/Port of Refuge

In order for the FOSC and Unified Command to approve a salvage and port of refuge plan, a large amount of technical data is needed in a timely manner. A decision-making tool on salvage and port of refuge for the FOSC should be explored. This tool should incorporate stakeholder interests, provide various options, and address major issues. *This issue was raised in the NIC- and National-level TTEXs.*

Los Angeles/Long Beach Port Closure

A decision-making process for port closures should be explored. This process needs to be site specific. The Port of Los Angeles/Long Beach (LA/LB) is the largest port in the country, and neighboring ports would not be able to handle the overflow. In addition, the LA/LB port closure would cost \$1 billion per day. Would the Responsible Party have any liability for the closure? Where would liabilities fall if this was a terrorist incident? Additionally, the impacts of port closures should be addressed. *This issue was raised in the NIC-and National-level TTEXs.*

Security

For an incident involving an oil spill triggered by an act of terrorism, the protocol for vessels in the affected port in addition to those vessels transiting in the vicinity and near the crime scene is unclear. The protocol should address vessels entering or departing the vicinity and relocating to neighboring ports. In addition, the credentialing of personnel at the crime scene should be addressed. *This issue was raised in the National-level TTEX.*

Funding a SONS

All funding sources and supplemental appropriations for a SONS should be explored. Does funding from the Robert T. Stafford Disaster Relief and Emergency Assistance Act apply to a SONS when the cost of responding exceeds the Oil Spill Liability Trust Fund? *This issue was raised in the National-level TTEX.*

APPENDIX

5

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APPENDIX

6

ACRONYMS AND ABBREVIATIONS

A

ACP Area Contingency Plan
API American Petroleum Institute

B

B&TS Border & Transportation Security

C

CAC Crisis Action Center
CFR Code of Federal Regulations
CGHQ Coast Guard Headquarters
COTP Captain of the Port
CWA Clean Water Act

D

DC District of Columbia
DHS Department of Homeland Security
DOD Department of Defense
DOI Department of the Interior
DOJ Department of Justice
DOS Department of State

E

EOC Emergency Operations Center
EPA Environmental Protection Agency

F

FAA Federal Aviation Administration
FBI Federal Bureau of Investigation
FEMA Federal Emergency Management Agency
FOSC Federal On-Scene Coordinator
FRP Federal Response Plan

G

GIS Geographical Information System
G-LMI U.S. Coast Guard Office of Maritime and International Law
G-MOR U.S. Coast Guard Office of Response
G-MPP U.S. Coast Guard Office of Maritime Port Security Programs
GOM Government of Mexico
G-OPF U.S. Coast Guard Office of Operational Contingency Planning

H

HSOC Homeland Security Operations Center

I

ICS Incident Command System
IIMG Interagency Incident Management Group
IMH Incident Management Handbook
IMO International Maritime Organization
INRP Initial National Response Plan
ISC Integrated Support Command

J

JFO Joint Field Office
JIC Joint Information Center
JRT Joint Response Team

L

LA/LB Los Angeles/Long Beach
LAN Area U.S. Coast Guard Atlantic Area

M

MATES	Multi-Agency Team-Building Enhancement System
MEXUS Plan	Joint Contingency Plan between the United Mexican States and the United States of America Regarding Pollution of the Marine Environment by Discharges of Hydrocarbons or other Hazardous Substances
MEXUSPAC Annex	Pacific Annex of the MEXUS Plan
MISLE	Marine Information for Safety and Law Enforcement
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MSEL	Major Scenario Event List
MSRC	Marine Spill Response Corporation

N

NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEBA	Net Environmental Benefit Analysis
NIC	National Incident Commander
NIMS	National Incident Management System
NIIMS	National Interagency Incident Management System
NOAA	National Oceanic Atmospheric Administration
NPFC	National Pollution Fund Center
NRC	National Response Center
NRP	National Response Plan
NRS	National Response System
NRT	National Response Team

O

OPA or OPA 90	Oil Pollution Act of 1990
OSC	On-scene Coordinator
OSLTF	Oil Spill Liability Trust Fund
OSPR	Office of Spill Prevention and Response
OSRO	Oil Spill Removal Organization

P

PAC Area	U.S. Coast Guard Pacific Area
PDT	Pacific Daylight Savings Time
PFO	Principal Federal Official

R

RCP	Regional Contingency Plan
RCRA	Resource Conservation and Recovery Act
RIC	Regional Incident Command
RP	Responsible Party
RRT	Regional Response Team

S

SIOSC	State Interagency Oil Spill Committee
SONS	Spill of National Significance
SOSC	State On-scene Coordinator

T

TTX	Table Top Exercise
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U

UC	Unified Command
USCG	United States Coast Guard
USN	United States Navy

V

VNN	Virtual News Network
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