

DRAFT List of Initial Recommendations

Regarding the Deepwater Horizon Oil Spill Response in Florida

September 7, 2012

NOTE: This list of DRAFT recommendations was developed by Tetra Tech, based on research and interviews, for consideration by members of the Florida Commission on Oil Spill Response Coordination. The information which follows has not been discussed by the Commission, and is presented for information purposes only. The information is organized by general topic area. Note that a list of acronyms used in this document appears on the last two pages.

Planning & Operations Issues

- Specify additional pre-event requirements for Area Contingency Plans (ACPs), including provisions for plan development, approval, and execution:
 - Identification and prioritization of environmentally sensitive areas
 - Update ACP policy guidance to include:
 - dispersant use (or restriction);
 - protective measures for different types of oil;
 - worst-case discharge scenarios;
 - response personnel qualifications, position assignments, and description of when the ACP or levels of the ACP get implemented
 - Improve state, local (county and city), and public participation in the ACP development process
 - Thorough vetting of ACP components with, and acceptance by, each Gulf coast County in Florida
 - Use of applicable ACP measures modeled from other state ACPs across the US (*positive* application of “lessons learned” – including from DWH)
 - Better application of sound science in area contingency planning, considering water currents, tidal variations and the effects of protective measures used in environmentally and economically sensitive areas
 - Include advantages and limitations of proposed ACP measures to make each entity aware of ramifications and impacts
 - Each potential ACP element should be exercised with a maintenance component to ensure functionality over the long term

- EPA and USCG should amend the NCP to provide more detailed guidance on the development of Regional Contingency Plans (RCPs) to include:
 - Local (county and city) involvement and acceptance of RCPs
 - Vessels of Opportunity (VOO) implementation guidance is needed
 - Require Oil Spill Removal Organization to participate in the planning process
 - There is a need for better prioritization and protection of economic and environmental resources
 - Volunteer coordination guidance is needed
- Define responsibilities and assignments related to a Spill of National Significance (SONS):
 - Incorporate Florida state and county emergency management personnel, contracts, and Emergency Operations Centers (EOCs) to ease the burden on the USCG
 - Establish Memorandums of Understanding (MOU) or Cooperative Agreements between state of Florida and USCG to pre-solicit quickly approvable contracts for implementation of ACP elements similar to pre-storm contracts
 - Conduct SONS exercise periodically – every two or three years? – and include participation by all five Gulf coast states (FL, AL, MS, LA and TX)
 - Hold Gulf coast SONS meetings or conferences every two or three years to review ACPs, previous SONS exercise “lessons learned,” technological advancements, regulatory changes, One Gulf Plan changes, and other pertinent items
 - Revise SONS policies to include state and local governments in the SONS response organization

Command & Control Organization and Functions

- Require that federal, state, and local governments participate in USCG’s policy on connecting with the National Response Framework (NRF). USCG will be in the leadership role, with heavy involvement from all levels of government.
- Amend NRF and the National Contingency Plan (NCP) organizational structures to accommodate state and local representation.
- USCG and EPA should direct NRT and Regional Response Teams (RRTs) to improve outreach and educational efforts in an ongoing effort to better explain the National Response System (NRS) and NCP to policymakers, state and local governments, and other stakeholders.
- Require USCG to include state and local emergency management personnel in NCP training and exercises that includes sharing/coordination of applicable resources, such as State Emergency Response Team (SERT) Air Branch.

- Require FEMA to include federal, state, and local personnel in National Incident Management System/Incident Command System (NIMS/ICS) training.
- Clarify role of “local” governments in NCP – for example, ICP Houma worked directly with Louisiana parishes, but ICP Mobile did not.

Resources & Logistics Issues

- Greater reliance on local government personnel in implementing ACPs and other protective measures
- Require ICP branches to be established in each affected state when oil reaches within 9 nautical miles of state waters.
- Require USCG and the Responsible Party (RP) to be represented and functional within each state EOC when oil reaches within 9 nautical miles of state waters.
- Establish a unified Gulf coast web mapping application compatible across all five Gulf coast states to track data reports (e.g., the Geospatial Assessment Tool for Operations and Response – GATOR)
- Develop standards and processes for expedited collection, processing, correlation, analysis, and distribution of satellite imagery and oil thickness sensors to provide real-time direction of spill response operations.
- Require that response vessels be directed in real-time by controllers in the air, not on water
- Establish real-time requirements for RP to communicate with federal, state and local governments.
- USCG should develop policy guidelines for Vessels of Opportunity (VOO) as part of the RCPs and ACPs, with pre-certification, implementation requirements, sustainability requirements, and execution utilizing a “locals first” procedure

Acronym List

AC	Area Command
ACP	Area Contingency Plan
BOEM	Bureau of Ocean Energy Management (US Department of Interior)
BSEE	Bureau of Safety and Environmental Enforcement (DOI)
CEMP	Comprehensive Emergency Management Plan
CFO	Chief Financial Officer
CWA	Clean Water Act
DACS	Florida Department of Agriculture and Consumer Services
DCA	Florida Department of Community Affairs
DEM	Florida Division of Emergency Management
DEP	Florida Department of Environmental Protection
DFS	Florida Department of Financial Services
DOH	Florida Department of Health
DOI	US Department of the Interior
EMAC	Emergency Management Assistance Compact
EMC	EM Constellation
EPA	US Environmental Protection Agency
EOC	Emergency Operations Center
ESF	Emergency Support Function
DOT	Department of Transportation
FEIL	Florida Emergency Information Line
FLANG	Florida Air National Guard
FLNG	Florida National Guard
FOSIL	Florida Oil Spill Information Line
FSERT	Forward State Emergency Response Team
FWC	Florida Fish and Wildlife Conservation Commission
GATOR	Geospatial Assessment Tool for Operations and Response
HSPD	Homeland Security Presidential Directive
IC	Incident Commander
ICS	Incident Command System
JIC	Joint Information Center
MOU	Memorandum of Understanding
MTSRU	Maritime Transportation System Recovery Unit
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NIMS	National Incident Management System

NOAA	National Oceanic and Atmospheric Administration
NRF	National Response Framework
NWS	National Weather Service
OPA	Oil Pollution Act (also OPA90)
OTTED	Governor's Office of Tourism, Trade, and Economic Development
PIO	Public Information Officer
PRFA	Pollution Removal Funding Authorization
RCP	Regional Contingency Plan
RECON	Reconnaissance
RERN	Remote Emergency Response Node
SBA	Small Business Administration
SCAT	Shoreline Cleanup and Assessment Technique
SCO	State Coordinating Officer
SEOC	State Emergency Operations Center
SMT	State Management Team
SERT	State Emergency Response Team
SOGs	Standard Operating Guidelines
SOPs	Standard Operating Procedures
SOSC	State On-Scene Coordinator
SWAN	Simulating WAves Nearshore
SWO	State Watch Office
Tt	Tetra Tech
UC	Unified Command
USCG	United States Coast Guard
VOO	Vessels of Opportunity