

Evolution of Contingency Planning in California – a Federal and State Coordinated Effort

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ABSTRACT (#687342)

U.S. Coast Guard (USCG), U.S. Environmental Protection Agency (USEPA), and California Department of Fish and Wildlife (CDFW), Office of Spill Prevention and Response (OSPR) agreed to the joint preparation of oil spill contingency plans following the enactment of California and federal laws in 1990. With little guidance initially, six Area Committees embarked on a new process to create the first coastal Area Contingency Plans (ACPs) in 1992. In 2015, when emergency regulations to expand OSPR's jurisdiction statewide became effective, developing inland Geographic Response Plans (GRPs) became a top priority. Over the last 30 years, the ACPs have evolved into robust, nationally recognized planning documents, and response plans have expanded into inland environments.

This paper will describe in detail the contributions and advancements in California oil spill contingency planning over 30 years. It will highlight OSPR's approaches for statewide consistency and coverage, interoperability between various state and federal plans, tools (including Geographic Information System (GIS) and various databases), improved sensitive site

contacts and management, and lessons learned. It will also cover goals for future improvements in both marine and inland contingency plans.

INTRODUCTION

The federal Oil Pollution Act of 1990 (“OPA 90”; an amendment to the Clean Water Act) created the first requirements for national oil spill contingency planning. The United States Coast Guard (USCG) is designated as the lead agency for planning and response in coastal zones and certain major inland water bodies, whereas the United States Environmental Protection Agency (USEPA) is the designated lead for inland zones. Under a tight statutory timeline (18 months from enactment), the USCG acted swiftly in convening Area Committees and developing Area Contingency Plans (ACPs) for the entirety of the coastal zone, per OPA 90. This was a large task given that California alone has almost 1,000 miles of coastline.

Soon after, the California Legislature followed suit, having experienced too many of its own major oil spills over the decades. It enacted the Lempert-Keene-Seastrand Oil Spill Prevention and Response Act (“Lempert-Keene”) in 1990 to mandate oil spill contingency planning for the coastal waters of the State. It vested that responsibility with the newly created Office of Spill Prevention and Response (OSPR) within the California Department of Fish and Wildlife. Though the California legislation was less specific than the Federal legislation regarding how to implement oil spill contingency planning, it stated that a new California State Oil Spill Response Plan provide “an environmentally and ecologically sensitive areas element that shall provide the framework for prioritizing and ensuring the protection of environmentally and ecologically sensitive areas” (Lempert-Keene). The OSPR Administrator deemed the federally mandated ACP process the best approach and reached a Memorandum of Agreement

(MOA) with USCG to cochair the six coastal Area Committees. In this USCG-OSPR joint effort to produce the six ACPs in 1992, the division of labor placed responsibility for ecological and wildlife issues with OSPR (Sutkus).

EVOLUTION OF CONTINGENCY PLANS

The birth of Area Contingency Plans

To accomplish such a daunting task of delineating the coast, identifying sensitive environmental sites, developing response strategies, and drafting plan content, USCG and OSPR crafted a development process with strict deadlines. The coastline was divided into six (initially seven) geographical areas within each of the three USCG Sectors, each having clear authority over newly defined Area Committees and ACPs. To encourage local government participation, grants were made available to all coastal administering agencies to write their own local oil spill contingency plan with the condition that they also take an active role in the ACP development process. Subcommittees were utilized to address each topic required under OPA 90. Twenty-two subcommittees were eventually formed in each of the Area Committees, leading to over 100 subcommittees meeting regularly with an estimated 1,000 individuals participating across the State. All participants received a clear set of written directions outlining this subcommittee process before the effort began (Sutkus).

Meanwhile, OSPR scientists along with state and federal counterparts and local experts, were simultaneously characterizing the coast using new, standardized data collection forms (described more in detail later). Staff worked to complete the required "...detailed annex containing a Fish and Wildlife and Sensitive Environments Plan...[to be] prepared in consultation with the U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration (NOAA), and other interested natural resource management agencies and

parties” (USEPA). These forms, and associated maps and response strategy diagrams (also discussed later), were to be known as the “environmental sensitive sites response strategy” pages, which comprised the bulk of Section 9800. In 1992, Area Committees completed the first editions of California’s coastal ACPs.

The first Geographic Response Plan

The development of inland oil spill contingency plans lagged marine ACPs due to significantly less available resources (money and staff). USEPA, with its historically underfunded mandates and programs (especially when compared to the USCG), was tasked with inland oil spill preparedness, planning, and response and CDFW’s Wildlife Protection Division (which included one biologist for the State) was responsible for inland spill response. Although spills of varying magnitudes occurred across the interior of the State, it was a major spill on the East Walker River in late 1999 that initiated the development of the first inland Geographic Response Plan (GRP) with CDFW as the lead. USEPA participated in both the response and planning process, but most of their resources were allocated to other hazardous material responses and remediation projects.

While ACPs historically buried important tactical and operational information in hundreds of pages of details, inland contingency planners envisioned a more streamlined, user-friendly approach. The USEPA’s Handbook for ACPs (page 6) outlines that, “GRPs may ...serve to address sub-regional concerns since their focus is on specific response strategies and tactics for narrowly-defined areas.” As such, the first GRP focused on initial oil spill response and access to the waterway, including response strategies at specific sites. It was a relatively short document meant to serve first responders and was not intended to protect specific environmental sensitive sites. The original GRP and ACPs varied in their content, usability, and

consistency, and they would continue to vary through the coming decade. Though both would serve as models for future revisions and new plans in California and nationwide.

Two decades of contingency plan revisions

A USCG District-level ACP Coordinator was assigned in 1992 to assist with the new plans, and Sector-level civilian coordinators were subsequently hired as well. OSPR saw a similar need and value in statewide coordination, but fluctuated in holding such a staff position, resulting in the responsibility moving between headquarters and the field offices. These oversight and program coordination shifts led to various levels of District and statewide consistency in the revision processes, data management, and type and depth of content throughout the years. OSPR has always participated in the planning and revision processes nonetheless, often driving improvements and technological advancements, and continues to provide technical expertise that is unavailable in many other USCG Districts.

Chiefly, the first ACPs were locally focused planning documents, with some shared statewide-applicable content, and were formatted after the United States Department of Defense's Joint Operation Planning and Execution System (JOPES). USCG Headquarters direction evolved, beginning with providing some format guidance, then a cumbersome ACP Template & Management System, and eventually a more user-friendly checklist. There was not a lot of attention on the ACPs or changes to guidance after 9/11 when the USCG's priority shifted to port security. The focus did not shift back until the Deepwater Horizon oil spill in 2010, when ACPs and their importance regained public interest. Around this time, USCG guidance also replaced JOPES with Incident Command System (ICS) structure, which most emergency planners and responders were using by then.

The ACP revision and approval process also varied greatly since their inception. ACPs were updated once to every two years initially until 2000, then transitioned to a formal three-year revision cycle between 2000-2014. In 2018 a new USCG revision process was established, including a national panel review of select ACPs yearly. Now a staggered five-year revision schedule is instituted, beginning with Sector San Diego (ACP 6) in 2018, Sector Los Angeles/ Long Beach (ACPs 4 and 5) in 2019, with the final three plans (Sector San Francisco; ACPs 1-3) due in 2022. This new process aims to ensure ACPs nationally are consistent, robust, updated, and more user-friendly. Although California ACPs were superior to many other states' ACPs in these areas already, in light of reinvigorated national interest, OSPR revamped its own program by drafting new guidance, templates, and work plans to enhance statewide consistency and collaboration, with internal benchmarks and deadlines.

After completing the East Walker River GRP in the early 2000's, CDFW and USEPA began pursuing the development of more response plans. With USEPA's engagement and some federal funding, interstate waterways and water bodies became a priority of USEPA Region 9 (California, Arizona, Nevada). The Truckee, Upper Sacramento and Carson Rivers were identified for plan development. Given the added complexity of multiple state jurisdictions, an Area Committee of federal, state, and local agencies convened for each plan to begin the development process. OSPR had developed years of expertise in oil spill planning on the marine side by this time, and therefore contributed to GRP development, but the CDFW Wildlife Protection Division remained the lead.

Momentum amongst the Area Committees resulted in the completion of three more GRPs in 2005 including the Carson River, Upper Sacramento River, and Truckee River. Seemingly that momentum and/or funding dried up until the mid-2010s. Interest in inland spill planning

again peaked due to a rapid proliferation of oil by rail, an increase in large interior spills, including Lac-Megantic, Quebec in 2013, and local train derailments along the Feather River in northern California. The Lake Tahoe and Lower Colorado River GRPs, both interstate waterways/waterbodies, were created around this time. Beginning in 2014, the rail industry, working in partnership with regulatory agencies, began developing GRPs as well, targeting their high-risk derailment locations. Two plans, the Feather River and Lake Almanor GPRs, have been completed so far, and in the event of an incident, are available to OSPR and other first responders.

OSPR's inland expansion

In 2015, Senate Bill 861 authorized the expansion of OSPR's program to cover all statewide surface waters at risk of oil spills from any source, including pipelines and the increasing shipments of oil transported by rail. It provided the additional statutory and regulatory authority for the prevention, preparedness and response activities in the new inland areas of responsibility. A key objective of this new mandate was creating more inland response plans that have the depth and breadth needed for modern emergency response plans.

The need to develop more GRPs for watersheds with high risk of an oil spill became a top priority, and with additional resources and funding, OSRP hired a Statewide Coordinator to lead the charge. Working in coordination with the USEPA and other federal, state, and industry stakeholders, GRP development, now with OSPR as the lead, was re-initiated in 2016 for prioritized rivers and waterbodies throughout California. With an intention not to reinvent the wheel, but to improve upon it, these inland GRPs model the successful format of the ACPs and existing inland GRPs in California and the Pacific Northwest.

Improved GRP development process

The process of creating a GRP document template began with researching existing response documents, including the National Contingency Plan, Regional Contingency Plan and ACPs. Numerous existing GRPs, developed in conjunction with USEPA Regions 9 and 10, as well as recent GRPs developed by industry railroad partners, were reviewed and were crucial to development of the GRP document template. OSPR wanted to take the best parts from existing plans, while ensuring that OSPR's authorities, policies and procedures were clearly stated.

GRP development was prioritized based on three factors: waterways within ¼ mile of pipelines, facilities, or high-risk rail; areas with higher risk to sensitive fish and wildlife and the habitats that they depend on; and areas with cultural and historic concerns. The response strategies identified within GRPs are ultimately driven by access to sites along river systems and lakes where tactical response operations are feasible. OSPR developed a list of recommended waterways for GRP development by carefully analyzing waterways in each of its three field office jurisdictions. The evaluation was based on their potential for risk of oil spills by rail, pipeline, or other industry accidents; history of spills; and presence of threatened and endangered species. For the first planning cycle OSPR focused on developing one plan per Local Emergency Planning Committee (LEPC) region in the State, which equated to six plans.

Numerous committees and workgroups were formed to produce the new GRPs. A Statewide GRP Steering Committee (SGSC) was formed to provide a forum for stakeholders (industry and oil spill response agencies) and local, state, and federal agencies to help guide effectiveness, efficiency and consistency with developing inland GRPs for the State. The SGSC facilitates a transparent process inclusive of the partners that OSPR and USEPA work with

during spill response, recovery, and remediation. Furthermore, an OSPR internal GRP Workgroup was formed, consisting of staff and supervisors from each of the three field response teams (FRTs), GIS support, and OSPR upper management. The Statewide GRP Coordinator facilitates monthly meetings with the GRP workgroup to develop and refine the GRP template, response strategy detail sheets, and maps, and to populate species and economic resources-at-risk tables. Additionally, local GRP Subcommittees review and comment on each respective GRP for their area. Each subcommittee is unique and may be comprised of assigned EPA staff, state agencies local to the area (such as a Regional Water Quality Control Board), local authorities (such as water agencies), and county and city emergency managers, as well as local industry partners.

The GRP review and comment process consists of a three-tiered approach. The local GRP Subcommittee reviews the draft GRP first, followed by the internal GRP Workgroup. The last step in the review process lies with the OSPR upper management team. Once their review is complete and comments are incorporated, the final GRPs are posted to OSPR's website.

Data management and display

While GRPs were different from ACPs in their implementation, they have both evolved as technology in data management has improved. All contingency plans have advanced significantly through access to and use of better-quality data and technology. The use of GIS and database software has evolved as technology improved, allowing agencies to create digital libraries and use web-based platforms to view sensitive sites, response strategies, and other pertinent response related information. Initially these technologies, including digital maps and data management were inconsistently used statewide. The first ACP maps were photographically enlarged NOAA nautical charts with colored stickers attached representing the various

sensitivity of the sensitive sites. The first digital maps of sensitive sites and response strategies were rudimentary, including low resolution scanned USCG 1:24K topographic maps (that may not have been updated for years).

Once OSPR bolstered its GIS lab and staff in the mid-1990s, internally producing maps and databases became a cornerstone to the enhancement and usability of the contingency plans. GIS software and technology today are significantly more user friendly and accessible, including common operating pictures like NOAA's Environmental Response Management Application (ERMA). Switching to higher resolution aerial imagery and converting diverse spill response-related data into GIS formats noticeably improved the maps as well.

In the earliest oil spill planning years, data management relied on hard copies. OSPR, working in conjunction with other State and federal natural resource trustees (NOAA Hazmat, NOAA Sanctuaries, National Park Service, U.S. Fish and Wildlife Service), developed a rationale to evaluate the first proposed environmental sensitive sites on the coast. To achieve a uniform approach for identifying these sites, criteria were developed to qualify sensitive sites and differentiate their levels of sensitivity based on ecological issues (irrespective of ownership or agency interests). OSPR also recognized the need for consistency in the process of site documentation and strategy development, so the Site Information and Spill Response Strategy (SISRS) form was developed and refined to gather specific information about each coastal site and to develop site protection strategies.

In 1998, OSPR committed to converting all site information into a digital format through the development of the SISRS database (using Microsoft Access). This database held the promise of a new era in spill contingency planning and response because information in a digital

format is more easily updated, managed, and operational. The SISRS database was first used to produce portions of the ACP revised in 2000. In 2014, OSPR began a multi-year process to create an updated database (ACP Environmental Database [ACPEDB]) and move existing SISRS data into it. The new output was revealed in the 2018 revision of the San Diego ACP. It centralized the data within OSPR, and in doing so, resulted in a parallel process to further streamline and standardize ACP data collection, description, and management across all the ACPs.

Data management and display for GRPs had a similar trajectory for CDFW, USEPA, and OSPR. Initially, OSPR gathered all information on hard copy notes and produced maps, while data was decentralized and housed amongst various lead state and federal agencies. Unlike ACP data, there has never been a central database or online data viewer (like ERMA) consistently used for GRPs within California. As more GRPs were drafted, each new plan informing the next, national and statewide guidance was produced (USEPA's ACP Handbook was first released in 2011), standardized methods developed and shared, and the use of advancing mapping technologies was improved. OSPR is continuously working to add new GRP data into ERMA while concurrently developing a database similar to ACPEDB. OSPR released a GRP template document, internal guidance on the GRP development process (including mapping and data collection), and best practices for California GRPs to ensure statewide consistency.

As GPS, cell phones, tablets, cellular service/satellites, Unmanned Aerial Systems (UAS, a.k.a. drones), and their applications advanced, so has data collection, management, and usability for contingency plans. Using tablet-based customized applications for electronic field data capture, staff can collect data in the field that can then be quickly incorporated into GIS and processed into maps and other outputs. The resulting GIS data are then viewable on laptops,

tablets, and smartphones, valuable for both planning and response. With the proliferation and vast capabilities of small UAS, OSPR began utilizing them in oil spill tracking and response. OSPR intends to eventually employ UAS derived HD images to produce better quality maps for planning as well. Furthermore, increasing interoperability between internal databases and apps, utilizing online cloud-based servers, and having more powerful computing capabilities will have beneficial implications in the planning process and the usability of contingency plans. While striving to continuously improve these plans and the planning process, OSPR has contributed to the improvement of oil spill response as well.

Economic sensitive sites

As a natural resource trustee, OSPR's primary jurisdiction within contingency plans is the required "detailed annex containing a Fish and Wildlife and Sensitive Environments Plan" (specifically Section 9800 of the ACPs and diffuse in the GRPs) is the integral section. However, per federal regulations of contingency plans, "A description of the area covered by the plan, including the areas of special *economic* ... importance that might be damaged by a discharge" are also to be included. By including economic sites in the plans, it folds local agencies and businesses into the planning process, informs these stakeholders of oil spill risks, sets their expectations regarding response, and empowers them to take pre-spill mitigation actions (Ex: a marina purchases their own harbor boom). As such, economic sites were eventually identified and categorized in all ACPs and new GRPs. Like environmental sensitive sites, which were listed with their comparative level of sensitivity to one another, the economic sites are too. Economic sites are included to inform response, but not to prioritize economic site protection over human health or environmental sensitive site protection.

Cataloging economic data differed amongst the plans, as some plans simply listed sites, whereas other mapped them. The types and description of these sites also varied. The format was not similar either. Eventually, over years of revisions and improved coordination, these variances lessened, and ERMA housed all of the ACP's economic sites. As of late 2019, OSPR created a sub-database within ACPEDB that specifically houses economic sensitive sites. The categories have been updated and the site information is more standardized, readily accessible for response, and more easily and centrally managed. GRPs currently list economic sites in tabular format and include contact information.

Cultural and historic resources and tribal inclusion

Oil spill planners and responders must abide by federal and state laws and regulations pertaining to historic property protection, tribal governments, and culturally sensitive sites (Ex: National Historic Preservation Act of 1996). The commitment to incorporate these resources and stakeholders into both planning and response is a priority for California. In response to that priority, these plans have evolved with more comprehensive processes to protect cultural and historic sensitive resources. Due to the confidential nature of the information, these sites are not mapped or explicitly listed in the plans. Instead, the plans provide contacts for the State Office of Historic Preservation and local "Information Centers", who maintain the California Historical Resources Information System, an elaborate database whose access is restricted to certified archaeologists. Both marine and inland (post 2016) describe the statewide process for obtaining this information.

Tribal government inclusion and participation has similarly evolved in contingency planning. Contingency plans now describe the requirement for spill responders to contact recognized tribal representatives by obtaining a list of tribes in the impacted area through the

Native American Heritage Commission (NAHC). All plans should also include NAHC contact information. Tribal governments are encouraged to participate in Area Committees and LEPC-GRP Subcommittee meetings to ensure their concerns are addressed in the planning phase, but participation has varied across the State and over time (in general, participation in these meetings is cyclical and increases after a spill). NAHC and tribes are also invited to participate in the testing of the plans at drills, which also serves as relationship building.

Through participation in Area Committee and LEPC-GRP Subcommittee meetings, spills, drills, and other forums, OSPR has built better working relationships with representatives of these agencies, tribal governments, and other entities. Additionally, these emergency response procedures are continuously tested and refined making them more reliable and understood. The obligations of Federal and State On Scene Coordinators are now clearer through these relationships and experiences during spills.

REFLECTIONS ON CONTINGENCY PLANNING IN CALIFORNIA

Staff involved in the development and revision of these plans unanimously stress the importance of fully dedicated federal (civilians for USCG) and state agency plan coordinators. These positions drive the consistency, robustness, and collaboration seen in California plans. These plans are considered living documents, therefore lessons learned and best practices are intended to be reflected in each plan revision. It is helpful when there is one or more plan “keepers” to ensure this happens. Furthermore, the coordinators generate guidance and templates, facilitate internal and external meetings, and ensure decisions are captured, plans are drilled, and lessons are incorporated.

OSPR, a dedicated oil spill preparedness and response office within a Wildlife agency, is unique when compared to similar state programs nationally. Other USCG Districts and

USEPA Regions coordinate with state agencies, but many states do not have dedicated divisions that deal specifically with oil spills and also have natural resource trustee authority. OSPR's personnel (200+ staff), equipment, and funding has been vital to generating comprehensive planning documents, particularly in the identification of sensitive environmental sites and response strategies. OSPR participates in both the planning and response phases, ensuring continuity and cross-pollination between the two phases as well.

The process for contingency plan development, revision, and testing may be as beneficial, if not more, than the completed plan themselves. "The Area Committees [and LEPCs] provides a forum for all parties to identify problems, resolve conflicts, and become informed about issues raised by actual and potential incidents. The Area Committees [and LEPCs] provides an effective mechanism for communicating and informing a wide audience about the response and planning concepts as part of the National Response System" (USEPA). Under the National Preparedness for Response Exercise Program, each Area Committee is scheduled for an exercise every three years, with the intention of incorporating lessons learned into the next ACP revision. Ultimately these plans promote interagency coordination as a means of improving the effectiveness of responses.

OSPR's Sensitive Site Strategy Evaluation Program, birthed in 2003 in the San Francisco Bay, consists of scheduled exercises designed to test ACP response strategies and familiarize Oil Spill Response Organizations with the locations and strategic details of the ACP sites. OSPR environmental scientists discuss the outcomes and recommended modifications or alternatives to the Area Committee, who then vote to approve or deny the change. Changes to the strategies, if approved, are then incorporated into the next annual ACP update or major revision. This Program is successfully implemented across all of California's ACPs.

Unlike the ACPs, which have been consistently revised over their lifetime, only a portion of existing GRPs have been revised to date. There is also no formal process in place to test GRP response strategies. OSPR hopes that as the newest inland GRPs get approved, they too will be exercised as a part of industry lead drills. OSPR, State of Nevada agencies, and the USEPA acknowledge the value in ensuring these plans are maintained and useable and are engaged in early discussions of testing and revising their shared GRPs. Additionally, OSPR, USEPA and industry partners are leveraging other drills and exercises being conducted, such as a swift water boom training courses, to incorporate some aspects of the GRPs, as a means of testing the plans' identified response strategies.

LOOKING AHEAD

The second planning cycle to produce eight new GRPs throughout the State began in June 2019 (See Figure 2). Each OSPR Field Response Team determined which waterways in their respective areas were priority rivers for plan development. Some rivers will be divided into multiple plans, such as the Santa Ana River, and others, such as the Klamath River, will be one comprehensive document. Plan development for the second planning cycle includes the Klamath River, Lower Sacramento River, Lower American River, Salinas River, Santa Ana River (divided into 3 plans), and the Santa Margarita River. Each plan, except for the Lower American River and the middle and upper sections of the Santa Ana River, will terminate at the Pacific Ocean, and therefore adjoin with an ACP. The Lower American River GRP will terminate at the confluence with the Sacramento River, which flows into the Sacramento-San Joaquin River and is in the Sector San Francisco ACP.

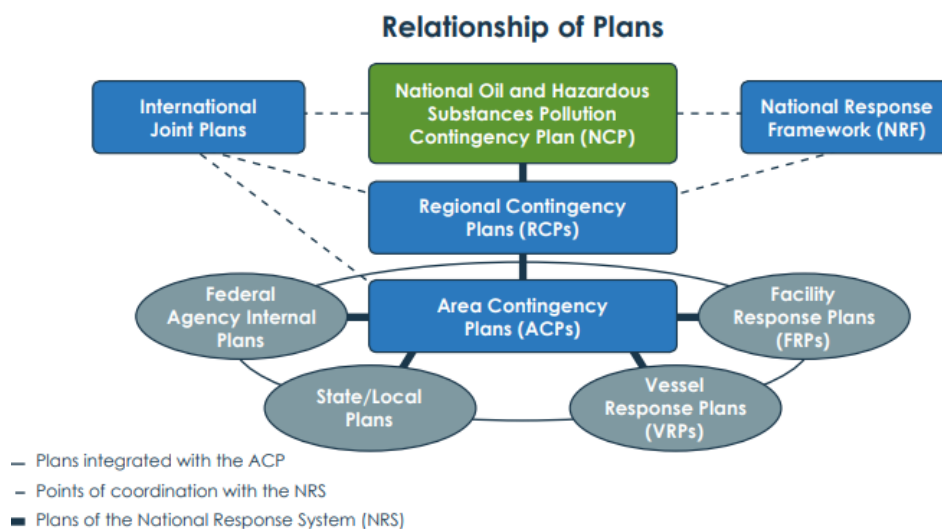
ACPs and GRPs are intended to serve as defensible resources for planning and early spill response. In California, this goal has been realized. Moving forward, the goal is to streamline the plans and ensure they reflect changing laws and regulations, technologies, stakeholder concerns, and societal needs. Since 2018, OSPR has worked directly with Sectors to tediously comb through dense ACP content to update language, remove superfluous information, include new resources, templates, and guidance from lessons learned, and modernize the documents. OSPR also implemented changes in sections where there were inconsistencies between ACPs.

Increasing plan interoperability is a goal for OSPR and is the intention of OPA 90 and subsequent regulations. EPA guidance indicates that ACPs should “also interface with plans developed by state and local authorities, and by vessel and facility owners/operators, as well as with other ACPs in bordering jurisdictions, such as those developed by USCG. The diagram below illustrates the relationships between the various plans” (USEPA). ACP Coordinators have already begun to review content shared across the six ACPs and make recommendations to move that shared information into the Regional Contingency Plan, making the ACPs more locally-focused and response driven, and unencumbering them. Contingency plans historically cross-referenced each other, but hyperlinks for digital formats have facilitated utilizing multiple plans simultaneously. Additionally, as more contingency plan information is brought into a common operating picture, like ERMA, the easier it will be to access and utilize multiple plans as well.

Finally, as OSPR and stakeholders develop more GRPs, gaps between California’s inland waterways and its coastline will diminish (See Figure 2). An example includes the proposed Lower Sacramento River GRP, which will connect the current Upper Sacramento River GRP with the Sector San Francisco ACP, ensuring complete coverage for California’s largest river. The hope is that responders can pick up any contingency plan, whether it is an ACP or GRP, and

be able to utilize it efficiently and effectively, as they are intended. OSPR is striving for consistently high standards in plan development (and revision) and is committed to statewide oil spill preparedness.

Figure 1. Relationship between Contingency Plans



Source: USEPA

CONCLUSION

State law requires OSPR to meet a best achievable protection standard of California's natural resources. OSPR is focused on improving consistency in the development of and content within state and regional contingency plans. OSPR will continue to encourage the use of new technologies to effectively plan for and respond to spills. After the first ACPs in 1992, OSPR touted that the "completed documents stand as models for the rest of the nation to follow, and the methods used to accomplish this goal highlight a useful approach to complex programmatic tasks" (Sutkus). Now, 25+ years later, OSPR continues to create contingency plans that are a benchmark for other states, with a goal to ensure they are more concise, yet comprehensive, user-friendly, and technologically advanced.

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Figure 2. Statewide ACP and GRP coverage



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