APPENDIX A: OVERVIEW OF THE ORGANIZATIONAL AND MANAGEMENT PRINCIPLES OF THE INCIDENT COMMAND SYSTEM

TABLE OF CONTENTS

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A.1 ORGANIZATIONAL PRINCIPLES

The spill response community in Alaska has adopted the ICS because:

- It is the most widely used management system in Alaska.
- It provides a common organizational structure, terminology, and procedures that facilitate team building and communications within the emergency response organization and between them and federal and State government agency response organizations.
- The use of "an ICS-type system" is mandated by OPA 90.

Consistent with the organizational principles of ICS, FRTs and IMTs are functional, modular, and hierarchical in nature. Each of these principles is elaborated upon in the following discussion. In addition, Alaska spill responders have adopted the ICS principle of Unified Command (UC) to ensure that response efforts are closely coordinated with all responding agencies. The principles of UC and agency participation also are discussed below.

A.1.1 Functional in Nature

The primary organizational principle of ICS is that response teams should be functional in nature *(i.e., they should be organized to carry out the work that must be performed to protect people, property, and the environment during an incident)*. In the ICS, five major functions have been identified that serve as the foundation of the incident response organization. They are: Command, Operations, Planning, Logistics, and Finance/ Administration. All five functions can be addressed by a single person -- an Incident Commander (IC). Indeed, under ICS the IC is responsible for all incident functions until the IC delegates one or more functions to subordinate personnel -- Command and General Staff. The Command Staff is composed of Information, Liaison, Legal, and Safety Officers, and the General Staff consists of Operations, Planning, Logistics, and Finance/Administration Section Chiefs. Duties of each member of the Command and General Staff are summarized below.

COMMAND

Incident Commander (IC): The IC is responsible for managing overall emergency response operations, and serves as the primary contact person for all outside parties regarding the nature and status of an incident and field response operations.

Response operations that are complex in nature, occur over a wide area, and/or include the active involvement of outside parties *(i.e., a CMT, high level government officials, and the media)* often create span-of-control

problems. When this occurs, the IC may appoint a deputy to assume primary responsibility for one aspect or more. Command may also be transferred to an equally or more qualified person. All transfers of command, whether at the FRT or the IMT level, should be accompanied by formal, preferably face-to-face briefings.

The Command Staff of the IMT consists of personnel organized into the following sub-functions: Information, Liaison, Legal, and Safety. Personnel filling these positions are called Officers. There is only one Command Staff position for each of these functions. The Command Staff does not have deputies; however, each of these positions may have one or more assistants, if necessary. On large incidents, it is not uncommon to see several assistants working under Command Staff Officers. An optional Command Staff position that may be activated is the Security Officer. This position is contingency plan-dependent and may be staffed at the direction of the Incident Commander.

The primary responsibilities of each member of the Command Staff are summarized below.

- **Information Officer**: Responsible for the formulation and release of information about the incident *(after UC/IC approval)* to the news media and other appropriate agencies and organizations. The incident Information function is the point of contact between the media, the public, and response team. The strength of this link depends upon the working relationship between the Information Officer and other team members. The Information Officer may work with Information Officers from other directly involved response organizations to form a Joint Information Center (JIC). When this occurs, one of the Information Officers becomes the Incident Information Officer.
- **Liaison Officer**: Responsible for communicating with local government officials and agencies not located in the Unified Command *[e.g., landowners, leaseholders, Regional Citizens Advisory Councils (RCAC), government agencies, and other interested parties]*. If these entities assign representatives to the incident, then communications with the FOSC/SOSC will occur within the ICS chain of command, or through the agency representative *(if assigned).* The Liaison Officer coordinates their activities as much as practical. Several Liaison Officers may be designated, depending on the level of coordination required. The Unified Liaison Officer will coordinate with the Regional Stakeholder Committee (RSC) if the RSC is activated. The Liaison Officer will also coordinate meetings between the agency representatives and the Unified Command.

- **Legal Officer**: Responsible for providing legal advice to their respective member of the UC and other members of the response team. The Legal Officer may be directly involved in the review of media releases, environmental permits, contracts, and documentation, and in the conduct of natural resource damage assessment negotiations.
- **Safety Officer**: Responsible for monitoring and assessing safety conditions, providing the IC with advice on all safety matters, developing measures for assuring personnel safety, and for supporting the activities of safety personnel involved in field response operations. The Safety Officer may exercise emergency authority to stop or prevent unsafe acts when immediate action is required.

GENERAL STAFF

The General Staff of an IMT consists of personnel organized to carry out the following functions: Operations, Planning, Logistics, and Finance/ Administration. Personnel filling these positions are referred to as Section Chiefs.

Each of the General Staff may appoint one deputy or more to: share the administrative burdens of the Section Chief; represent the Section Chief in the Chief's absence; relieve the Section Chief *(e.g., at night)*; or take on special tasks assigned by the Section Chief. A deputy normally is drawn from the Incident Management Team; however, he/she may come from a directly involved federal and/or State government response organization. Designating a deputy from a governmental entity can greatly increase coordination and cooperation. A deputy should be as qualified as the person for whom they work.

The primary responsibilities of each member of the General Staff are summarized below.

- **Operations Section**: Responsible for managing all response operations directly applicable to the incident. The Chief supervises operations, organizational elements, and directs its execution. The Chief recommends changes to the IAP and provides updates on the field response portion for the NOP IAP and General Plan, as appropriate. **Field command** is responsible for every aspect of field response operations, and must ensure they are carried out in a safe, effective, and efficient fashion.
- **Planning Section**: Responsible for: managing the collection, evaluation, display, and dissemination of operational information about an incident; the preparation of Incident Action Plans for each operational period; the preparation of a General Plan, if appropriate; the preparation of incident-specific plans; the provision of a wide range of environmental services; the check-in and assignment of Technical

Specialists; the documentation of response operations; and the organization and management of demobilization operations.

- **Logistics Section**: Responsible for: managing the acquisition of the equipment, personnel, materials and supplies needed to carry out response operations; and the provision of services necessary to support response resources.
- **Finance/Administration Section**: Responsible for: managing the imposition of strict financial control procedures; providing cost analysis and accounting services; receiving and processing claims, and administering contracts.

A.1.2 Support Organizations

Alaska Regional Response Team (ARRT)

The Alaska Regional Response Team (ARRT) is a standing body established by the NCP. The ARRT is composed of State and federal agencies *(see the Unified Plan for ARRT member agencies).* The ADEC provides the State's representative. The alternate State representative is provided by the Department of Military and Veterans Affairs/ Division of Emergency Services (DMVA/DES). The ARRT provides a regional mechanism for the development and coordination of preparedness activities prior to a pollution response.

During a significant spill response, the ARRT members or their representatives will participate in the FOSC's ICS as appropriate. The ARRT can coordinate assistance and advice to the FOSC by providing additional federal and State resources and expediting approvals for federal and State permits. The ARRT is chaired by the agency providing the FOSC *(USCG or EPA).*

While assigned to ICS sections within the Unified ICS, ARRT members or their representatives are immediately available to work with other agencies that have similar concerns and responsibilities. This enhances the timeliness and thoroughness of decisions. A formal "convening" of the ARRT during a spill event is only necessary for dispute resolution or major policy issues affecting multiple agencies. During any response requiring State input to the ARRT, the SOSC is delegated the authority to serve as the State's representative to the ARRT. Appropriate ARRT members are convened as necessary to make decisions on *in-situ* burning, use of chemical countermeasures, and nationwide permits *(404 permits)*.

The Agency Representative

Each supporting agency that has a role in an oil or hazardous substance discharge response designates an Agency Representative. An Agency Representative is that individual assigned to an incident who is delegated full authority to make immediate and pertinent decisions on any and all matters affecting that agency's involvement with the incident. The Agency Representative works directly with the FOSC or SOSC or his/her designee on dispute resolution, as outlined in the previous section. In matters which concern only a single agency, the FOSC or SOSC confers directly with that Agency Representative. When no Agency Representative is present or assigned, the FOSC or SOSC contacts the appropriate agency.

- **State Agency Representatives**: The commissioners of each supporting State agency appoint the Agency Representative for their department.
- **Federal Agency Representatives**: The ARRT representative for the incident serves as the Agency Representative unless otherwise designated.

Regional Stakeholder Committee (RSC)

Unlike the Multi-Agency Committee (MAC) defined in the NIIMS ICS, RSCs do not play a direct role in setting incident priorities or allocating resources. However, an RSC, when activated, can advise the UC *(through the Liaison Officer)* and provide recommendations/comments on incident priorities, objectives, and the incident action plan. An RSC normally is activated for significant incidents which involve resources under the jurisdiction of several agencies.

Regional Stakeholder Committees are specifically defined in each of the ten federal/State subarea contingency plans to include specific composition and basic responsibilities. The RSC membership may vary from incident to incident and from phase to phase. The composition of RSCs may include Regional Citizens Advisory Councils (RCACs), community emergency coordinators, landowners, leaseholders, and special interest groups affected by the spill. Agencies/organizations that are functioning as part of the overall ICS response structure should not provide redundant representation on the RSC.

As indicated above, the RSCs are not directly involved in field response operations, though some of its members may be. The RSC's role is to convey to the UC information relating to the authority, concerns, and expertise of its members. It recommends to the UC overall objectives and priorities, and reviews Incident Action Plans.

During incidents where there is no FOSC, federal agencies with jurisdictional responsibilities for resources at risk could participate as members of the RSC, thus retaining their input on containment, oversight, and cleanup. However, the preferred approach is to include these agencies as part of the overall ICS structure.

Regional Stakeholder Committee activities are coordinated by the Liaison Officer. Regional Stakeholder Committee discussions are documented and their recommendations and dissenting opinions are communicated to the UC through the Liaison Officer.

- **RSC Chair**: Regional Stakeholder Committee Chairpersons are designated in the subarea contingency plans. In cases where the RSC Chairperson is not predesignated, RSCs may be chaired initially by the Liaison Officer. The RSC then elects its own chair.
- **Leaders of Oil-Impacted Communities**: An alternative to the RSC for communities impacted by a major spill may include the establishment of a group consisting of leaders from the oil-impacted communities.

The Regional Citizens' Advisory Council (RCAC)

The Oil Pollution Act of 1990 (OPA 90) establishes two RCACs in Alaska: the Prince William Sound RCAC, and the Cook Inlet RCAC. The RCACs are independent, non-profit organizations which monitor and advise on oil industry programs to include areas such as spill prevention and response, tanker safety, and environmental impact assessments. The RCACs' role in the spill response organization is clearly defined in the Prince William Sound, Cook Inlet, and Kodiak Subarea Contingency Plans. The normal response of the RCAC is to provide local knowledge and technical expertise within the ICS structure *(e.g., as part of the Operations and Planning Sections, and the Joint Information Center).*

Investigation Teams

During a major event, the Responsible Party, Federal lead agency, and State lead agency will activate Investigation Teams to investigate the nature and cause of the incident. Investigations may be conducted in a joint or separate manner, depending on the legal nature of the investigation (i.e., Federal/State intent to seek civil or criminal prosecution, based on the incident). Investigation teams from Federal, State, and local agencies will not normally be part of the IMT. While investigation personnel may report to individuals who are part of the UC, the investigators should remain as a separate entity so as not to introduce polarizing forces into the response teams. The initial point of contact may be the Liaison Officer, or the Legal Officer. When in the field, all personnel (NRDA staff, investigators, etc.)

will report to the cognizant on-scene commander for safety, support, and accountability.

A.1.3 Modular in Nature

Emergency response organizations are activated and deactivated in a modular fashion. When an incident occurs, the IMT IC activates only the functions needed to support field response operations, and deactivates the functions as soon as they are no longer needed.

A.1.4 Hierarchical in Nature

Emergency response organizations are hierarchical in nature. There is a clear chain-of-command to facilitate communications and the decision-making process.

A.1.5 Other Organizational Principles

Finally, there are two other points that must be made about an ICS-compatible organizational approach. First, although the spill response community in Alaska has adopted a hierarchical approach, their response organizations should not be viewed as bureaucratic in nature. Response personnel at every level are fully empowered to discharge their roles and responsibilities, and to interact and communicate with each other as they work together, as a team, to address an incident. Second, the structure of their response organizations is flexible. No matter how good pre-incident organizational efforts are, the work to be performed during an incident may require modifications to the structure to accommodate new positions added to address new functions that emerge during the course of response operations.

A.1.6 Principles of Unified Command

When an incident occurs, the spill response community in Alaska views it as a single problem, requiring a single, highly focused response effort. Constructing such an effort can be difficult when multiple organizations exist with the authority to launch simultaneous, potentially divergent response operations. The Unified Command concept is designed to address this problem.

The spill response community in Alaska views the Unified Command as a structure that is created at the time of an incident to bring together the "Incident Commanders" of each major organization involved in response operations. In Alaska, the members of Unified Command are usually the

Federal On-Scene Coordinator, the State On-Scene Coordinator, and the Responsible Party's On-Scene Coordinator/ Incident Commander.

The primary responsibilities of Unified Command are to:

- Establish objectives and priorities.
- Review and approve tactical plans developed to address objectives and priorities.
- Ensure the full integration of response resources.
- Resolve conflicts.
- Consult with natural resource trustees as necessary.

These responsibilities are typically exercised through the conduct of periodic, highly focused Unified Command meetings with attendance typically restricted to the members of Unified Command.

The role of the FOSC and the SOSC in the Unified Command is to fulfill their legal responsibilities *(i.e., to direct and/or monitor response operations),* while allowing the Responsible Party to manage emergency response operations.

When an incident occurs, the Unified Command structure is established at the top of the IMT. In this position, the Unified Commanders are ideally situated to carry out the responsibilities cited above. They provide overall direction by establishing Strategic Objectives and response priorities that must be addressed by the IMT through the planning process. Moreover, they review and approve the products of the planning process *(i.e., Incident Action Plans and General Plans)* developed by the IMT to address the objectives and priorities.

Their position at the top of the IMT also facilitates the appropriate integration of response resources. For the FOSC and SOSC, it allows them to determine the appropriate role(s) for agency personnel and to position them optimally within the IMT structure. For the Responsible Party, it ensures members of the IMT have access to valuable expertise without diluting their ability to manage response operations.

To date, three roles have been identified for government personnel working within the IMT. In this capacity, they can fulfill any of the three governmental functions *(oversight, augmentation, and lead)* while serving as monitors/advisors, integrated resources, and managers. These roles are defined as follows:

- **Monitors/Advisors**: Personnel assigned to observe the actions undertaken by the IMT to ensure it is acting in a manner consistent with the directives of the Unified Command. A Monitor serves as the eyes and ears of agency On-Scene Coordinators to assist them in the exercise of their "direct mode" authority. They may also provide advice to one or more members of the Unified Command and/or personnel on the IMT.
- **Integrated Resources**: Personnel assigned by an agency On-Scene Coordinator to serve as a member of the IMT. An Integrated Resource is managed by a superior on the IMT.
- **Managers**: Personnel assigned to assume a position on the IMT and manage the actions of subordinate personnel *(i.e., when the Responsible Party is judged to be doing an inadequate job in one or more functional areas).*

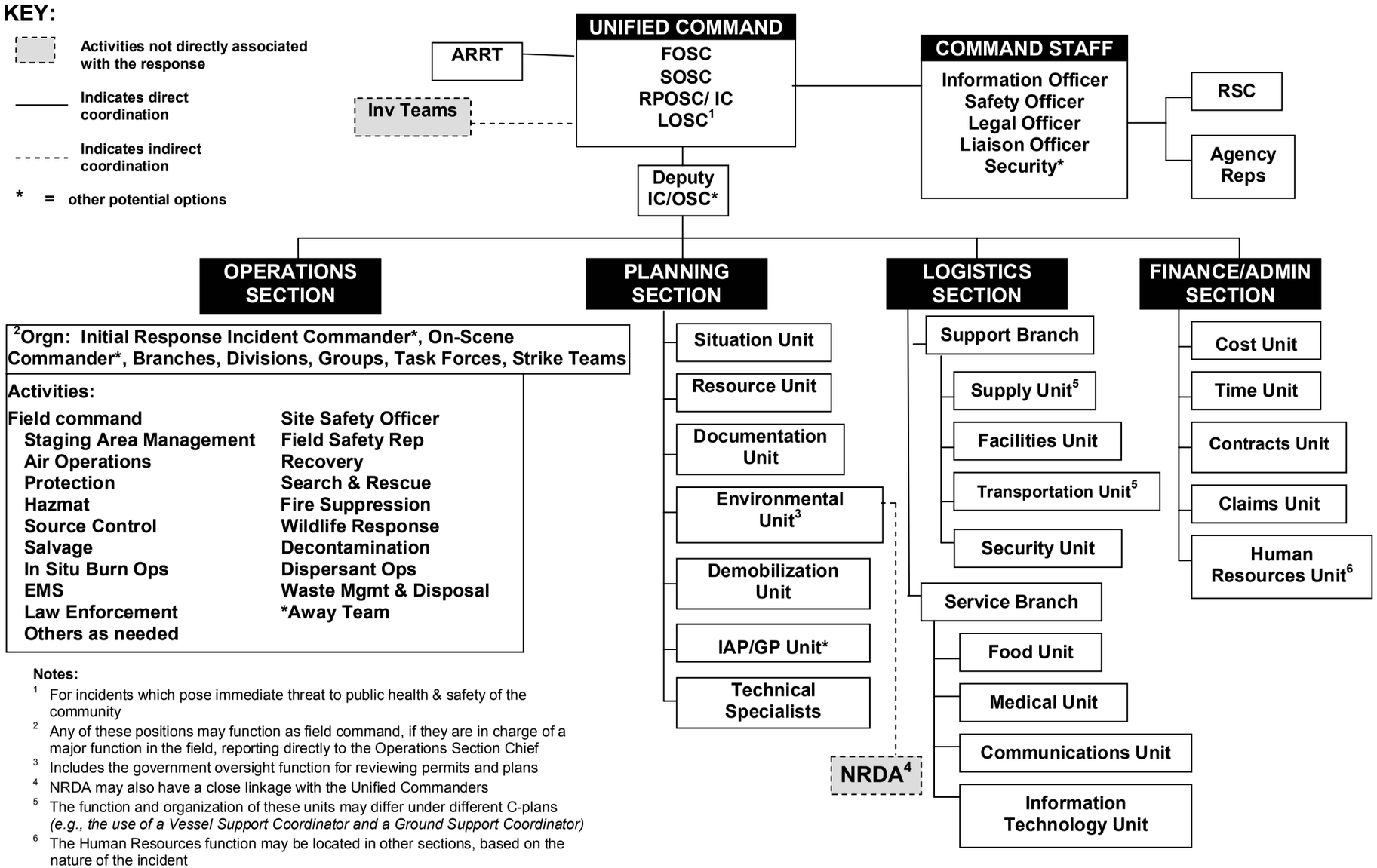
As noted in Section 2.0, there are additional agency responsibilities that are managed simultaneously throughout the incident but not through the joint efforts and combined resources of the Unified Command. These include, as an example, investigation and law enforcement, natural resource damage assessment, restoration activities, and maintaining documentation for possible litigation and cost recovery.

Agency personnel may be asked to assume more than one role at a time, or their role may change during the course of response operations. The role of agency personnel is determined by the Federal or State On-Scene Coordinator. The FOSC and/or SOSC provide the IMT Incident Commander with clear guidance on the role(s) to be assumed by agency personnel.

A.1.7 ICS Organizational Structure

The example ICS organizational chart depicted in Figure A-1 provides a suggested method of organizing the Incident Management Team for an oil or hazardous substance release incident. Several footnotes are included to demonstrate additional, optional methods of organizing the team, based on the situation or individual organizational needs.

Figure A-1: EXAMPLE ALASKA ICS STRUCTURE FOR OIL AND HAZARDOUS SUBSTANCE RELEASES



Notes:

1. For incidents which pose immediate threat to public health & safety of the community
2. Any of these positions may function as field command, if they are in charge of a major function in the field, reporting directly to the Operations Section Chief
3. Includes the government oversight function for reviewing permits and plans
4. NRDA may also have a close linkage with the Unified Commanders
5. The function and organization of these units may differ under different C-plans *(e.g., the use of a Vessel Support Coordinator and a Ground Support Coordinator)*
6. The Human Resources function may be located in other sections, based on the nature of the incident

A.2 MANAGEMENT PRINCIPLES OF ICS

The spill response community in Alaska has adopted the following ICS management principles:

- Common terminology
- Manageable span-of-control
- Objectives-driven response
- Incident action plans
- Comprehensive resource management
- Incident facilities
- Integrated communications

Each of these principles is explained below.

A.2.1 Common Terminology

An emergency response organization is made up of individuals who normally do not work together as a team except during emergency response operations. When they come together, the use of common terminology is viewed as an essential element in team building and communications, both internally and with response personnel from government agency response organizations.

The Incident Command System promotes the use of common terminology, and has an associated glossary of terms that help bring consistency to position titles, the description of resources and how they can be organized, the type and names of incident facilities, and a host of other subjects.

A.2.2 Manageable Span-of-Control

Manageable span-of-control is the most fundamentally important management principle of ICS. It applies to the management of individual responsibilities and response resources. The objective is to limit the number of responsibilities being handled by, and the number of resources reporting directly to, an individual. Based on experience, the number is thought to range from three to seven, with five being considered an optimum number.

When span-of-control problems arise around an individual's ability to address responsibilities, they can be addressed by expanding the organization in a modular fashion. This can be accomplished in a variety of

ways. An Incident Commander can delegate responsibilities to a Deputy and/or activate members of the Command and/or General Staff. Members of the Command Staff can delegate responsibilities to Assistants, and members of the General Staff can appoint Deputies, Branch Directors, Unit Leaders, and Division and Group Supervisors.

When the number of single resources exceed a person's span-of-control, the resources can be grouped together into Task Forces *(or Strike Teams if the same type resource).* When the number of task forces exceeds a person's span-of-control, they can be grouped into Divisions *(i.e., when the strike teams and/or task forces are assigned to a specific geographic area)* or Groups *(i.e., when the strike teams and/or task forces are assigned to functions that cross the geographic boundaries of Divisions).* When the number of Divisions and/or Groups exceed a person's span-of-control, the Divisions and/or Groups can be broken down into Branches.

A.2.3 Objectives-Driven Response

Members of the Command and General Staff are responsible for the development of Strategic Objectives that clearly define what the IMT/FRT is working to achieve during the conduct of emergency response operations. Based upon the information presented at the Initial Incident Briefing Meeting and the analysis of incident potential, the Incident Commander, Officers, and Section Chiefs should have a clear understanding of the major problems that need to be addressed by the IMT/FRT. The Planning Section Chief is responsible for ensuring the Strategic Objectives define how the IMT/FRT plans to address the problems. Strategic Objectives should be written and posted on the Incident Objectives Status Board in the Incident Situation Display. Good objectives are specific, measurable, assignable, reasonable, and time-related. (See the inside front cover for a list of generic spill response objectives).

A.2.4 Incident Action Plans

The structured pattern of thought described in Part A.2.3 leads to the formulation of field assignments. Field assignments describe exactly what is going to be done to address response objectives, by whom, how, where, when, and with what resources.

Field assignments, in turn, serve as the nucleus of a document referred to as the Incident Action Plan (IAP). The IAP generally is prepared for a

prospective period of time referred to as the next operational period (NOP). Besides field assignments, the IAP also contains:

- Objectives for the NOP
- An organizational assignment list *(or organization chart)* for the NOP
- Communications plan for the NOP
- Emergency medical plan for the NOP
- Air operations plan for the NOP
- Other documents

The actual contents of the IAP vary depending upon the nature and demands of response operations. When two or more response organizations are responding to an incident, it is important that the organizations work together *(i.e., through Unified Command and the integration of response personnel)* to formulate one consolidated IAP that fully addresses mutually agreed-upon objectives.

A.2.5 Comprehensive Resource Management

In Part A.2.2, an explanation is provided on how to address response resource-related span-of-control problems by grouping single resources into task forces, and by assigning single resources and/or task forces to Divisions or Groups. Such reconfigurations and assignments not only address span-of-control problems, but help ensure that all resources are properly managed.

Comprehensive resource management also applies to the classification of resources by "kind" and "type," and the categorization of resources by their status--"en route," "assigned," "staged/available," and "out-of-service." The "kind" of resource describes what the resource is; the "type" of resource describes a performance capability for a "kind" of resource.

Resources dispatched to, but not yet checked-in at an incident scene, are "en route" resources. Resources working on a field assignment under the direction of a supervisor are considered to be "assigned" resources. "Available" resources are those that are ready for deployment, but have not been "assigned" to a field assignment *(note: all resources in a staging area should be on an "available" status)*. Checked-in resources that are not in either the "staged/available" or "assigned" categories are considered to be in an "out-of-service" status. Resources can be "out-of-service" for a variety of reasons, including: a shortfall in staffing *(i.e., not enough people to operate equipment)*; personnel taking a rest; maintenance or repair; weather; demobilization, or others.

A.2.6 Incident Facilities

Response operations can form a complex mosaic that must be held together by response personnel working at different, often widely separate incident facilities. These facilities can include:

- **Field Command Post (FCP):** The FCP is the location from which all field response operations are directed. If established, there should be only one FCP for an incident. Field command operates from the FCP. Conversely, responses can be conducted without this single post.
- **Incident Command Post (ICP):** The ICP is the location where the IMT operates during response operations. The Incident Commander operates from the ICP. If a Unified Command is created *(see Part A.1.6),* it also should operate from the ICP.
- **Staging Area:** Can be a location at or near an incident scene where available tactical response resources are stored while they await assignment. Resources in staging area are under the control of Field Command or the Staging Area Manager. Several staging areas may be created during emergency response operations.
- **Logistics Base:** A location where primary logistics support and services activities are based and performed.
- **Camps:** Locations, often temporary, that are equipped and staffed to provide sleeping, food, water, sanitation, and other services to response personnel that are too far away to use base facilities.
- **Helibase:** A place for parking, fueling, maintaining, and loading helicopters used during response operations.
- **Heliport:** A location where helicopters can safely land and take off.

Each facility has unique location, space, equipment, materials, and supplies requirements that are often difficult to address, particularly at the outset of response operations. For this reason, responders should identify, pre-designate and pre-plan the layout of these facilities, whenever possible.

A.2.7 Integrated Communications

The ICS stresses the importance of both "soft" and "hard" communications. "Soft" communications refers to the exchange of information between and among individuals working on emergency response operations, and between the emergency response organization and outside organizations directly involved in response operations.

"Hard" communications refers to communications equipment and how it is organized and used during response operations. Incident Command System procedures facilitate the use of "soft" communications.

To ensure the most effective and efficient use of communications equipment, the ICS stresses the importance of preparing and maintaining a comprehensive, integrated communications plan. Under such a plan, all "hard" communications resources are organized and specified. Three examples of a communications plan follow.

The North Slope operators have organized their communications into networks. These networks can include:

- **Crisis Network**: Established to link the IMT Incident Commander with the CMT Crisis Manager.
- **Command Network**: Established to link the IMT Operations Section Chief with the FRT Field Command.
- **Tactical or Operations Network**: Established at the field level to link appropriate tactical response personnel to their supervisors.
- **Support or Supply Network**: Established to handle all logistics-related communications "traffic" from between the IMT Supply Unit and the Staging Area Manager.

In Prince William Sound, Alyeska and the TAPS shippers have organized their communications by:

- Pre-designating frequencies for a number of task forces and groups;
- Using dedicated phone lines at ICPs for the IMT and CMT; and
- Planning for incident-specific frequency assignments for other field functions and units.

A third communications plan could be created with incident-specific frequency assignments for field activities and the use of mobile phones or incident-installed phones for the IMT.

All "soft" communication that occurs over the networks is conducted in plain English. No "ten codes" are used. Also, all "soft" communications are confined only to essential messages.

A.3 ORGANIZATION OF GOVERNMENT RESOURCES

As stated in Section 1, the federal and State governments may assume three different roles during a spill response based on the availability and capabilities of the RP, and possible extenuating circumstances. The three roles *(Oversight, Augmentation, and Lead)* are discussed below.

General: Federal, State and local governments, as well as the RP, may require concurrent activities which must be performed in response to the spill, yet are not part of the containment, control and cleanup operations.

There are additional agency responsibilities that are managed simultaneously throughout the incident but not through the joint efforts and combined resources of the UC. These responsibilities include, but are not limited to:

- Determining the RP.
- Investigating the cause of the discharge.
- Collecting samples.
- Monitoring and determining the adequacy of the RP's response.
- Determining the extent of contamination.
- Determining natural resource damages.
- Monitoring restoration.
- Determining and recovering the State's costs and assessing penalties.

A.3.1 The Federal and State Oversight Response Organization

The OSCs direct the oversight and monitoring functions within the ICS, as well as representing their agency in the UC. This allows the OSCs to coordinate the activities of the monitoring effort with containment, control, and cleanup activities and with the activities of local government. The OSCs may designate Deputy OSCs to assist with this function.

- **Incorporation of Federal and State Agencies into a Single Government Response**: Although the USCG, EPA and ADEC are the lead federal and State agencies with broad responsibilities during an oil or hazardous substance discharge, other federal and State agencies have major roles in spill response, which are defined by federal and State statutes. The Federal OSC incorporates all federal agencies which have a regulatory role in oil and hazardous substance discharge into a single federal response with a single FOSC in charge. Even

though the FOSC is from the USCG or EPA, he/she is responsible for representing all federal concerns regarding the response action.

The State incorporates all State agencies which have a regulatory or mandated role in oil or hazardous substance discharge into a single State response with a single SOSC in charge. Even though the SOSC is from ADEC, he/she is responsible for representing all of the State's concerns.

In the federal and State's response, every effort is made to incorporate personnel from the participating agencies into specific ICS functional roles within the Planning, Finance/Administration, Operations and Logistics Sections and/or the Command Staff. All participants assigned to the response, while representing their respective agency, work under the direction of the FOSC or SOSC. Any disputes between agency personnel which cannot be resolved at the response staff level should be referred to their Agency Representative for resolution at the Command level. The FOSC is the final arbitrator within the federal response organization. All disputes should be resolved within the response structure so the federal government can speak with a single consistent voice -- the FOSC's. As per the NCP, disputes which cannot be resolved within the response structure can be elevated to the ARRT for resolution if within their jurisdiction. Disputes which cannot be resolved by the ARRT should be elevated to the National Response Team. The SOSC is the final arbitrator within the State's spill response organization. All disputes should be resolved within the response structure so the State can speak with a single, timely, consistent voice -- the SOSC's. Disputes which cannot be resolved within the spill response structure should be elevated by the Agency Representative, or SOSC, to the Disaster Policy Cabinet for resolution at the Commissioner level.

See Appendix B for a complete description of the duties and responsibilities for the specific government oversight functions described below.

- **Government Oversight Function**: This function is located in the Operations Section and performs the operations oversight function for the FOSC/SOSC. Responsibilities may include:
  - Determine the adequacy of the RP's response.
  - Collect and analyze information and advise the OSC of the adequacy of the RP's response.
  - Determine the need for, and recommend the use of additional resources or alternative tactics to the OSC, as required.
  - Determine the need for, and as required, recommend to the OSC orders to be issued to the RP to improve the adequacy of the RP's response.
  - Monitor RP efforts to control the source of the release.

- Observe, document and otherwise monitor the adequacy of the RP's containment and control efforts, including dispersant use and *in-situ* burn efforts.
- Participate in Unified Shoreline Cleanup Assessment Team (SCAT) and Tactical Assessment Group assessments pursuant to plans provided by the Planning Section.
- Monitor wildlife impacts and provide for wildlife protection, rehabilitation, and disposal.
- Monitor waste management operations for compliance with plans and permits.

In some situations, the RP's Operations organization can be mirrored by a government oversight function to ensure response operations are performed adequately. See Appendix B for the roles and responsibilities for these positions. The listing below is an example of how a field organization might be structured. Review individual industry plans for exact titles and field structure:

- Resource Protection Oversight Monitor
- On-Water Oversight Monitor
- On-Land Oversight Monitor
- Source Control/Salvage Oversight Monitor
- Hazmat Oversight Monitor
- Waste Management/Disposal Oversight Monitor
- Decontamination Oversight Monitor
- Wildlife Response Oversight Monitor
- ISB Operations Monitor
- Dispersant Operations Monitor

- **Permits/Plans Review**: This function is located within the Environmental Unit of the Planning Section and fulfills government oversight functions. Responsibilities may include:
  - Ensure the IMT is projecting the movement of the release and prepare/evaluate spill trajectory mapping.
  - Participate in and/or lead the identification of sensitive areas and prioritization of response efforts.
  - Participate in and/or lead the team determining the extent, fate and effects of contamination.
  - Identify the need for and prepare any special advisories or orders.
  - Identify the need for and issue State and federal permits and other authorizations in coordination with federal/State/private landowners; maintain permit status log.
  - Require and approve plans for the management of wastes.
  - Develop a plan for collection, transport, and analysis of required samples.

- Determine emergency corrective actions that should be taken to prevent further impacts.

- **Government Logistics**: In a government oversight role, functions may include: ordering, tracking, and servicing government resources; arranging for transportation and lodging for government response staff; providing communications to government oversight staff *(field monitors)*; and performing other logistics-related functions specifically in support of the government oversight role. Under a mutual agreement with the RP, these governmental functions may become an integral part of the overall RP-led Logistics Section.

- **Government Finance**: In any response where federal and State funds are expended, the FOSC and SOSC are required to maintain an accurate accounting of governmental expenses. For accounting, future auditing and potential litigation purposes, the expenses incurred by the RP, federal, and State must be tracked separately. The FOSC and SOSC may elect to integrate into the RP's Finance Section, but maintain the federal and State identity.

A.3.2 The Federal and State Response Organization when the Government Augments the Response Operation

The FOSC and/or SOSC may decide that government augmentation is necessary to supplement an RP's response due to the magnitude of the event or limited response resources on the part of the RP. In such cases, the FOSC and SOSC coordinate closely with the RP when bringing additional resources *(both personnel and equipment)* to augment the response operation. The UC agrees on the integration of federal and State assets into the overall incident management structure. Since incident management structures are situation-dependent and the need for government augmentation varies based on the needs and capabilities of the RP, a single recommended structure for the government augmentation scenario is not offered.

A.3.3 The Federal and State Response Organization when the Government is Leading the Response Operation

When there is no identified RP, or the RP fails to respond adequately, the federal and/or State government becomes responsible for the containment, control and cleanup operation. In these instances, the containment, control and cleanup effort is carried out by the Operations Section. A possible way to organize the Operations Section would be to divide the Operations Section into two major branches, Response and Oversight.

In this capacity, the FOSC/SOSC may elect to hire a response action contractor to perform containment and cleanup actions. The FOSC/SOSC would assume an oversight role and monitor the contractor's actions. However, the FOSC/ SOSC would also be responsible for certain response actions such as monitoring/ sampling, and investigations.

The example incident management structure provided in Figure A-1 may be applied to the extent necessary *(based on the magnitude of the event and the overall decision of the FOSC and SOSC).* The oversight functions do not apply in the case where the federal or State government assumes the lead role for the response effort.

A.3.4 Spills That Involve State/Federal Disaster/Emergency Declarations

A natural disaster may cause an oil or hazardous substance discharge. When a State disaster emergency declaration and/or a federal major disaster or emergency declaration is issued, additional procedures are necessary to coordinate the spill response effort with the overall disaster/emergency response effort.

These procedures are also used in cases where the spill itself is determined to be a disaster under State law and/or results in a federal emergency declaration.

For a complete discussion of the federal and State roles and organization under this type of situation, refer to the Unified Plan, Annex B.

End of Appendix A