

BOBBY JINDAL
Governor



State of Louisiana
Office of the Governor

Admiral Thad Allen
National Incident Commander
Deepwater Horizon Response
2100 Second Street S.W.
Washington, D.C 20593

August 4, 2010

Dear Admiral Allen:

Thank you for the meeting on Thursday to discuss the development of a transition plan related to ensuring that proper oil spill-related response capabilities and resources are maintained in our coastal area.

The State of Louisiana and coastal parishes are in receipt of the draft transition plan provided by BP and the United States Coast Guard. Going forward, we look forward to the opportunity to continue to work with you as the situation evolves. We also expect that parish and local officials will work with you directly on the transition plans that are reflective of the specific needs of their parishes.

We appreciate the opportunity to ensure that state and parish views are incorporated into the plan. State and parish leaders have spent considerable time reviewing and revising this document to reflect our collective views. All applicable coastal parishes and the State of Louisiana support the immediate execution of the attached transition plan.

Sincerely,

Handwritten signature of Garret Graves in black ink.

Garret Graves
Coastal Protection and Restoration Authority
Chairman

Handwritten signature of Kevin Davis in black ink.

Kevin Davis
St. Tammany Parish President

Handwritten signature of Michele Claudet in black ink.

Michele Claudet
Terrebonne Parish President

Handwritten signature of Paul Naquin in black ink.

Paul Naquin
St. Mary Parish President



Colonel Jerry Sneed
Deputy Mayor of Public Safety
Director of Homeland Security
& Emergency Preparedness-
City of New Orleans



Charlotte Randolph
Lafourche Parish President



Billy Nungesser
Plaquemines Parish President



Craig Taffaro
St. Bernard Parish President



Kirk Burleigh
Cameron Police Jury President



Wayne Touchet
Vermilion Police Jury President



Steve Theriot
Jefferson Parish President



Ernest Freyou
Iberia Parish President

Deepwater Horizon Response UAC Transition Plan

APPROVED:

FOSC

Date

BP

Date

TOI

Date

BOEM

Date

AL SOSC

Date

FL SOSC

Date

LA SOSC

Date

MS SOSC

Date

Deepwater Horizon Response UAC Transition Plan

The United States Coast Guard and BP acknowledge and pledge their support to the state and local parish authorities who are participating in the oil spill disaster response. The Coast Guard is to give great deference, to the extent possible based on scientific or otherwise objective consultation, to the local parishes during instances of operational disagreements between local authorities and BP.

The Unified Command at the Incident Command Post in Houma, LA and the Area Command in New Orleans, LA, recognize the state and local parishes' authority during the duration of the oil spill disaster/response and pledge that they be included throughout the decision making and planning process.

This plan is designed to serve as the framework by which individual parish plans will be developed through direct negotiations with parish leaders.

Overall Condition: Maintain immediate all zone response capability until Permanent Well Kill is completed. No change, without prior parish consent, regarding the status of response equipment for the remainder of hurricane season. Thirty days after the "Kill" is successfully completed, local municipal branches, parish president/mayor (or designee), the BP Branch Director and the USCG Branch Director will complete a joint inventory of all equipment, personnel, assets, and resources which will be used in the creation of a timeline for the demobilization of these assets. Resource readiness will also be maintained in the event of resumption of oil flow into the Gulf of Mexico. Resources will be repositioned to staging areas on parish approved high ground to prepare for severe weather contingencies, i.e., a Category 3 or higher storm.

Critical Resources: Until the end of hurricane season the following critical resource capability is required:

- BP establish a recurring budget for each parish to utilize in planning and operational implementation and to embed a BP representative within each said branch with the appropriate authority to execute said budget.
- Maintain a 200% parish developed and Incident Command Post approved boom plan (total includes deployed on water, in staging areas, and warehoused).

Personnel and Vessels of Opportunity will be adjusted based on actual operational requirements. Contracts are in place for the immediate and tiered increase of capability.

Purpose: Develop a strategic plan to enact a tailored response to efficiently and effectively meet response needs as well as transition to long-term recovery. This plan will promote consistency across the command structure and adjust to operational demands while completing the following:

- Maintain a Common Operational Picture (COP) across all ICP's and Branches to support a unified and coordinated response.
- A complete copy of all directives being sent from either BP or United States Coast Guard higher authority to the branch level directors is provided to the parish designated representative prior to implementation.
- Develop a tiered approach to resource allocation, redeployment, and demobilization
- Use the MC-252 well status, the location/amount of free oil on the water and shoreline conditions as key drivers. Based on:
 - SCAT data
 - Geospatial & Aerial observations of oil amount and distribution
 - On-water and shoreline recovery data
 - NOAA assessment & projections
 - State and federal commission of scientific experts develop and implement protocols for the detection, monitoring, and mediation of submerged oil. In the absence of such protocols, oil is presumed present.
 - Develop clear triggers for transition plan.
- Coordinate all activities related to this transition plan among the NIC, UAC, and ICPs including the Parish Presidents or their designated representative.
- Establish guidelines for scaling or repositioning people, contractors, equipment, and supplies to meet the needs of the incident.
- Implement directives from the parish severe weather contingency plan as integral components of each level of response operations.

Shoreline Cleanup Principles: Shoreline cleanup can generally be identified into 3 stages:

1. Clean-up: personnel are onsite daily
2. Monitor and React: Personnel are onsite every few days tending to deployed equipment (boom or other protective measures) or conducting limited cleanup. Hot-shot teams¹ will be deployed as needed to respond to new reports of oiling
3. Natural Attenuation: All equipment removed and periodic site monitoring; may not be at clean-up end points.

Guiding Principles:

- Levels may revert based upon reoccurrence of conditions identified at any previous matrix
- Be prepared to respond to all contingencies including weather and changing conditions and events
- Maintain continuous and effective communications to sustain parish, state, and other stakeholder support.
- Maintain efficiency and minimize waste through a well planned response with a clear concept of operation (COP).

¹ Hot-shot teams: Quick response teams available to respond to reports of new oiling, provide initial verification of report, and conduct clean-up and sampling as appropriate.

- VOOs/local fishing fleet will be given priority over contracted OSROs in the demobilization of assets. VOOs/local fishing fleet shall be employed to maintain, remove and re-deploy all boom or other protective measures, conduct oil reconnaissance missions, handle on water logistics, etc.

Action:

1. Incident Commanders shall develop transition plans consistent with this strategic plan using the following guidelines:
 - Recall times and estimated time to be on-scene shall be identified for all critical resources not currently in operational use until completion of hurricane season.
 - UAC will assist with providing the identified measures to the ICP at each response level.
 - The UAC will notify all ICs and branches when the permanent well kill is complete and resources may be adjusted to meet strategic and operational objectives.
 - ICs shall report the current Response Level to the UAC Situation Unit daily; response levels should be further delineated for each Branch level.
 - Branches may adjust the response structure as changes in operations and response levels dictate with parish approval.
 - Specific plans for what assets and personnel will be de-mobilized must be developed and coordinated with each parish for each phase of the transition.
2. Unified Area Command Staff and Section Chiefs and the Aviation Coordination Command, in coordination with the UAC Remote Sensing Coordinator, shall develop annexes consistent with the guidance of this plan.
3. No changes in Response Levels will be executed without coordination and concurrence of the parish.
4. Create a detail demobilization plan of the VOO's to include a joint inspection of these vessels to determine if there are any damages that were a direct result of their response effort. A process must also be created to immediately create a claim for said damages
5. Create a mutually agreed upon definition of when a shoreline is to be classified as "no further treatment."
6. Create a detailed monitoring plan that will address the following concerns:
 - a. What long term monitoring will be conducted
 - b. The frequency of the monitoring
 - c. Who will conduct the monitoring
 - d. A map of the sampling points
 - e. The sampling method
 - f. The parameters of the sampling and tests
 - g. Access to the test results
 - h. The term of the monitoring period

Level I: All Zone Response

Status: Well cap in place no new Deepwater Horizon product discharging into the Gulf of Mexico. Recoverable oil in the water in the offshore and nearshore (all state jurisdictional waters) environment and impacting the shoreline.

ACTIVITIES:

- SCAT Shoreline Assessment conducted under Stage I and II Nearshore and Shoreline Response Plan
- Continue air operations to detect presence of recoverable oil.
- Deploy full offshore, nearshore, and onshore recovery operations and protect shorelines

ORGANIZATIONAL STRUCTURE

- All zone response operation at NIC, UAC, and ICPs
- Maintain parish branch directors.
- Maintain parish BP and USCG liaison officers.

❖ TRIGGER TO ENACT LEVEL II: No recoverable offshore oil

❖ CONDITIONS: Sea conditions under four feet and southerly winds

❖ METRICS:

- No observations of recoverable oil concentrations offshore (outside state jurisdictional waters) for 5 consecutive days
- NOAA trajectories and models do not forecast any skimmable concentrations of offshore oil.
- No submerged oil plumes have been detected per established protocols.

❖ MEASURES:

- Reports from trained state and federal observers
- Daily Incident Awareness and Assessment (IAA) Summary
- Daily status map of NOAA aerial observation data (color coded) including number of total flights that created map and established submerged oil protocols.
- NOAA trajectory
- Satellite imagery of offshore oil (with short weather summary discussing potential impacts on image quality)

Level II: Nearshore and Shoreline Assessment and Cleanup

Status: No recoverable offshore zone (>3 miles) oil (on surface or submerged).

ACTIVITIES:

- Place offshore oil recovery operations in standby
- Continue SCAT Shoreline Assessment conducted under Stage I and II Nearshore and Shoreline Response Plan
- Deploy nearshore and onshore recovery operations as necessary
- Begin decontamination of offshore recovery vessels
- Redeploy offshore skimming equipment to nearshore where possible
- Recover nearshore floating or submerged oil and protect and clean shorelines
- Continue to assess deployment of nearshore and onshore resources
- Evaluate/implement appropriate boom or other protective measure strategies
- Commence in water monitoring activities including tar ball, nearshore submerged oil, and biological studies to support fisheries opening

ORGANIZATIONAL STRUCTURE

- Scale branch staging areas appropriately as approved by parish
- Scale ICPs & UAC appropriately
- Maintain parish branch directors
- Maintain parish BP and USCG liaison officers

❖ TRIGGER TO ENACT LEVEL III: No recoverable oil in water and no new significant shoreline impact for a period of six consecutive months.

❖ CONDITIONS: Sea conditions under four feet and southerly winds.

❖ METRICS:

- No aerial, vessel, or shoreline observations of skimmable concentrations of oil on 5 consecutive days of full saturation observations.
- NOAA trajectories and models do not forecast any skimmable concentrations of offshore or nearshore oil.
- No submerged oil plumes or pods have been detected or collected per established protocols.

❖ MEASURE: Areas of recoverable oil identified in nearshore or onshore impact

- Reports from trained state, federal, or local observers
- Daily IAA Summary
- Trend from Daily Status Map or any observation data
- Satellite imagery of nearshore oil (with short weather summary discussing potential impacts on image quality)
- Oil impact for total shoreline is considered “light”

Level III: Detailed Cleanup to Achieve Completion

Status: No recoverable oil in the nearshore environment. Remobilization of assets for episodic and intermittent oil recovery. No substantial re-oiling of shorelines.

ACTIVITIES:

- Decontaminate recovery vessels not in use.
- Maintain air observation assets to include AVWATCH.
- Continue execution of Boom Strategy
- Re-baseline SCAT under Stage III Near Shore and Shoreline Response Plan
- Deploy Onshore recovery operations to implement SCAT Shoreline Treatment Recommendations (STRs)
- Address intermittent nearshore re-oiling as required
- Continue in water and shoreline monitoring.

ORGANIZATIONAL STRUCTURE

- Rescale organization based on termination of on-water recovery operations
- Maintain parish branch directors
- Maintain parish BP and USCG liaison officers

❖ TRIGGER TO ENACT LEVEL IV: All STRs have been completed such that further treatment would not provide net environmental benefit (NEB)

❖ METRICS:

- No retrievable visible or submerged oil
- No sheen releasing that will affect sensitive areas, wildlife, or human health

❖ MEASURE:

- Percentage of shoreline miles signed off to be determined by federal, state and local authorities.
- Percentage of shoreline miles with no further treatment (NFT) recommended.
- Miles of shoreline signed off and miles of shoreline with NFT recommended.
- Trend of percentage of oil impact for total shoreline (Heavy, Medium, Light, No oil.)

Level IV: Maintenance and Monitoring

Status: Clean-up methods fully implemented. Habitat-based clean-up end points met and signed off. Remaining shoreline segments designated as NFT in Level III move to Level IV. Episodic impacts and discovery of oil continues.

ACTIVITIES:

- Review all oil recovery resources
- Natural attenuation of remaining oil
- Conduct routine monitoring
- SCAT surveys based on triggers relative to beach/shoreline profile (e.g. storm events)
- Assess equipment needed based on operational needs
- Develop and implement new STRs as determined through SCAT surveys
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment
- Establish standard communication protocol with all effected parishes
- Detailed SCAT survey of impacted shoreline segments
- Signoff of shoreline segments where cleanup is complete
- STRs developed as appropriate for remaining shoreline segments
- Develop long-term monitoring and restoration plan for remaining shoreline segments which cannot be signed off.
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment

ORGANIZATIONAL STRUCTURE

- Response framework returns to pre-existing National Response System (NRS) structure where coordination of the response is at the Coast Guard Sector/FOSC level.
- Maintain state liaison officer

❖ **TRIGGER TO ENACT LEVEL V:** Completion of winter storm season (Spring 2011)

❖ **METRICS:** To be determined.

❖ **MEASURE:**

- Period for NFT segment re-evaluation
- Percentage of miles of shoreline signed off
- Number of monitoring and restoration projects identified for Level V
- Parish rescinding of Declarations of Emergency

Level V: End State Status: Long-term Monitoring and Restoration

Status: Restoration complete. Episodic impacts and discovery of oil continues.

ACTIVITIES:

- On-going monitoring
- Deploy hot-shot teams to address episodic impacts and discovery of oil along shorelines or in near shoreline environment

Referenced or Associated Plans: (To be Developed and Communicated Separately)

- a. Near Shore and Shoreline Stage I and II Response Plan; Mobile Sector: Approved May 8,2010
- b. Near Shore and Shoreline Stage I and II Response Plan; Louisiana Division Sector: Approved May 6,2010
- c. Decontamination Plan
- d. Boom Strategy Plan
- e. Severe Weather Plan
- f. Near Shore and Shoreline Stage III Response Plan: *To be developed*
- g. Parish Severe Weather Plans
- h. Parish Boom Plans

Annexes: (To be Developed and Communicated Separately)

- I. UAC Logistics Section Transition Plan
- II. UAC External Affairs Transition Plan
- III. Aircraft Coordination Command

ADDITIONAL ITEMS FOR CONSIDERATION

1. Need details on the determination of when a shoreline is to be classified as “no further treatment.”
2. Detailed monitoring plan:
 - a. What long term monitoring will be conducted
 - b. The frequency of the monitoring
 - c. Who will conduct the monitoring
 - d. A map of the sampling points
 - e. The sampling method
 - f. The parameters of the sampling and tests
 - g. Access to the test results
 - h. The term of the monitoring period
3. Information must be provided on the “hot shot” response plans, where the teams will be located, the required response item, the response trigger mechanisms, and the POC for response team activation.