



U.S. Department of
Homeland Security
United States
Coast Guard



October 31, 2018

Capt. Michael Long
Commander
United States Coast Guard, Sector Honolulu
400 Sand Island Parkway
Honolulu, HI 96819-4326

RE: Hawaii Net Environmental Benefit Analysis: Consensus Evaluation of Tradeoffs Associated with Oil Spill Response Options - A Report to the Oceania Regional Response Team

Nike
Dear Sir:

Attached is the recently completed: *"Hawaii Net Environmental Benefit Analysis: Consensus Evaluation of Tradeoffs Associated with Oil Spill Response Options - A Report to the Oceania Regional Response Team"*. The primary focus of this Hawaii-based net environmental benefits analysis (NEBA) was evaluating the risk to ecological resources of concern (ROC) from spilled oil and five response options that could be implemented in the first 72 hours, specifically to limit oil spread and reduce oil landfall on shore as much as practicable.

Since the 1990s, the U.S. Environmental Protection Agency (EPA) and U.S. Coast Guard (USCG) have sponsored preparedness projects using comparative risk methodology to examine the relative advantages and disadvantages of the primary response options available in the early stages of an oil spill to mitigate oil spill impacts. Oil spill NEBAs are designed mainly as a contingency planning and training tool, because the deliberative process uses currently available science and produces shared knowledge among the workshop participants. It is most practical to consider and reach agreement among those with inter-jurisdictional responsibility about the potential limitations and benefits of available risk mitigation options BEFORE time-critical decisions must be made during response.

This NEBA was guided by a Steering Committee comprised of members of the Sector Honolulu Area Committee, notably representatives from the USCG, U.S. Environmental Protection Agency (EPA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Fish and Wildlife Service (USFWS), Hawaii Department of Health (DOH) and Hawaii Department of Land and Natural Resources (DLNR), Division of Aquatic Resources (DAR) and consultant support. Participants to the three (3) NEBA workshops compared the relative risks of natural attenuation and monitoring (leaving the spilled oil in the environment) to: surface application of dispersants (at 50% effectiveness); mechanical containment and recovery (offshore containment boom, skimming, and recovery operations); resource protection (specifically protective/exclusion and diversion booming, anchored nearshore); and shoreline cleanup.

EPA and the USCG have recently been working on a revision to the dispersant use plan, letter of agreement from the 1990's that set guidelines under which dispersants are pre-authorized for use on or in waters off the coast of the State of Hawaii. We plan to initiate consultation consistent with (1) the Endangered Species Action, Section 7 to evaluate effects of dispersant use on listed species and critical

habitat, and with (2) the Magnuson-Stevens Act to address effects on designated essential fish habitat. We will use much of the information and data generated by this NEBA to support those consultation efforts.

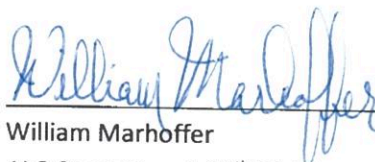
It is our expectation that among these other uses as outlined in the paragraph above, findings from this NEBA will be considered by the Hawaii Area Committee and Oceania Regional Response Team in future updates of the Area and Regional Contingency Plans.

If you require additional information, please contact Lance Richman, at 415-972-3022 or by email at richman.lance@epa.gov.

Respectfully,



Daniel A. Meer
U.S. EPA Region 9
ORRT Co-Chair



William Marhoffer
U.S Coast Guard, 14th District
ORRT Co-Chair

CC: NEBA Steering Committee

Attachment: Hawaii Net Environmental Benefit Analysis: Consensus Evaluation of Tradeoffs
Associated with Oil Spill Response Options - A Report to the Oceania Regional Response
Team.