

District Seventeen

Interim Guidance for Alternative Planning Criteria (APC) Submissions

Ref: (a) MER Policy Letter 01-17 Alternative Planning Criteria Guidelines for Vessel Response Plans

This guidance applies to vessel operations subject to 33 CFR 155 within the Captain of the Port (COTP) zones of Western Alaska, Prince William Sound, and Southeast Alaska. Its purpose is to identify Alaska specific areas of consideration for vessel owner/operators when citing and/or proposing *alternatives*. Terms italicized throughout this document are defined in reference (a).

Background. Alaska has unique challenges with *remote* areas, vast distances and seasonal operations. Consequently, vessels frequently operate in locations where part of the *National Planning Criteria (NPC)* may be deemed as inappropriate. In these circumstances, vessel owners/operators may propose *alternatives* to address Vessel Response Plan (VRP) requirements.

Submission Guidance. Submissions may include one or more *alternatives*. In addition to the general “conditions of acceptance” per reference (a), it is recommended that any submission for vessels operating in Alaska consider the following:

1. Vessel characteristics. Vessel specific characteristics impact NPC requirements. To aid CG review, it is recommended that supporting information be included in submissions to clarify:
 - a. Type of vessel(s);
 - b. Fuel group(s) and volume(s) carried on the vessel(s);
2. Vessel Operations. Vessel specific operations impact NPC requirements. To aid CG review, it is recommended that supporting information be included in the submission to clarify:
 - a. Types of operations conducted by the vessel(s) and their locations within the COPT zone. Operations may include transit routes; ports of call; fuel transfer/ lightering locations; storm avoidance areas, etc.; and
 - b. Seasonality of vessel operations (if applicable).
3. Analysis of response resources. *NPC* are used to determine the applicability and scope of *response resource* requirements. *Response resource* categories are summarized in Enclosure (1). To aid CG review, a submission should include calculations of the *NPC* requirements in all area of intended operations for covered vessels.

A comparison of available *response resources* to the associated *NPC* requirements will assist the CG in evaluating the *equivalency* of a proposed *alternative(s)*. The comparison of *alternative(s)* is generally discussed in terms of mobilization times, on-scene arrival, physical equipment capabilities and on-scene sustainment of response operations. For locations where *alternative(s)* are proposed, submissions should discuss *build-out plans* to increase *response resource* capabilities towards meeting NPC.

4. Contracts or other approved means. Contracts or other approved means, provide assurance that a resource provider is capable of and intends to commit to meet the specifications of the agreement. To aid CG reviews, it is recommended that submissions include a list of any *response resource* contracts or other approved means, associated with the proposed *alternative(s)*.
5. Statements of non-availability of response resources. In some areas of Alaska *response resource* providers exist, but they may not be available for contracting. To aid CG review, it is recommended that submissions include statements of non-availability for these circumstances, which clarify why particular resources are not used.
6. Oil Spill Removal Organizations (OSROs) and Cooperatives (Co-Ops). Citing an OSRO or Co-Op as *response resource* providers for *alternatives* may not provide adequate information to assist CG evaluation of the submission. If cited, it is recommended that submissions clarify the following in order to facilitate CG review:
 - a. A summary of the equipment and personnel supporting the *response resource* requirement; including details for mobilization times, on-scene arrival and physical equipment capabilities.
 - b. If applicable, a description of any restrictions that may curtail access to the cited equipment and personnel. Examples might include: limited response range; State of Alaska Contingency Plan (C-Plan) requirements; limited operating environments; availability of fixed facility personnel; etc.
7. Resource(s) of Opportunity (ROO). ROO, such as vessels of opportunity, have been included in past submissions. As ROO are not dedicated resources, circumstances likely exist where they are limited or unable to respond. If cited, it is recommended that submissions clarify the following in order to facilitate CG reviews:
 - a. Identification of the types of resources being utilized (e.g., seiner, stern picker, processor, landing craft, towing vessel, accommodation vessel, rotary wing aircraft, fixed wing aircraft, etc.). Vessel classifications, such as those used in the *Spill Tactics for Alaska Responders (STAR)* manual (page A-II-3) and in Alaskan geographic response strategies, are highly recommended. As applicable, also consider aircraft specifications such as cruising speed; observation speed; range; cargo, passenger and sling capacities; and installed or portable sensors.

- b. Identification of specific *response resource* requirement(s) that the ROO are capable of supporting.
 - c. Strategies to address availability challenges associated with normal, routine and/or seasonal ROO operations.
 - d. Training and exercise opportunities being made available to ROO.
8. Vessel routing. If an *alternative(s)* proposes routing measures, it is recommended that submissions clarify the following in order to facilitate CG reviews:
- a. A description of the routing procedures as applicable to vessels.
 - b. A description of the benefits associated with *response resources* as applicable during spills.
 - c. Procedures to ensure vessel compliance with the routing procedures.
 - d. Notification procedures to the COTP and *APC administrator* when vessel routing is not followed.
9. Notification of equipment non-availability. Circumstances can arise where *response resources* may become unavailable, such as scheduled maintenance. It is recommended that submissions include procedures for the following:
- a. Short term *response resource* non-availability (24 hours or less). For example, telephonic notification to the affected COTPs' command center relaying the change and expected resolution.
 - b. Temporary *response resource* non-availability (30 days or less). For example, written notification to the affected COTP(s) documenting the change, expected resolution, and impacts to vessel operations and response strategies.
 - c. Long term *response resource* non-availability (more than 30 days). A VRP amendment must be submitted to COMDT (CG-MER) in accordance with 33 CFR 155.1070(d) and .5070(b). Affected COTP(s) should also be provided written notification, which documents the change, expected resolution, and impacts to vessel operations and response strategies.
10. Compliance Considerations. Vessel owner/operators should consider the following when submitting *alternatives* and/or citing them in a VRP.
- a. Multiple *response resource* providers and/or *alternatives* may be required to attain *equivalency* with VRP requirements for areas of intended operations in District Seventeen.

- b. Failure to follow components of *alternatives* may result in vessel enforcement actions.
- c. Future changes in policy or regulation may require updates to an *alternative* prior to its expiration date. Failure to conform may warrant a recommendation that an *alternative* not be renewed or cited in VRPs.

Additional Information. For questions about submitting, modifying or renewing alternatives, please contact the applicable CG Sector response department. For questions about this guidance please contact CG District Seventeen, D17-APC-Comments@uscg.mil.

VRP Response Resource Categories

 <p>Qualified Individual</p>	 <p>Spill Management Team</p>	 <p>Aerial Tracking</p>	 <p>Sustainment</p>	 <p>Support Equipment</p>
 <p>On-water Recovery: AMPD</p>	 <p>On-water Recovery: MMPD</p>	 <p>On-water Recovery: WCD</p>	 <p>Shoreline Protection</p>	 <p>Shoreline Cleanup</p>
 <p>Dispersants</p>	 <p>Salvage: Assess & Survey</p>	 <p>Salvage: Stabilization</p>	 <p>Salvage: Special Ops</p>	 <p>Marine Firefighting</p>