



16450
FEB 26 2021

1-Call Alaska
Attn: Todd Duke
6231 South Airpark Place
Suite 215
Anchorage, AK 99502

Dear Mr. Duke:

The Coast Guard has reviewed the 1-Call Alaska Alternate Planning Criteria (APC) proposal for tank vessels sailing in the Western Alaska and Prince William Sound Captain of the Port (COTP) Zones received on August 18, 2020. In accordance with Title 33, Code of Federal Regulations (CFR), Part 155.1065, the Coast Guard accepts this APC with the following limitations:

- a. This APC may be referenced in VRPs submitted for approval of applicable operating areas in Western Alaska (WAK) through **February 29, 2024**. Use of this APC does not guarantee VRP approval and vessel owner/operators are still required to review it to ensure it satisfies the requirements applicable to their vessels before submitting their VRPs to the Coast Guard for approval.
- b. This APC does not address why NPC is inappropriate in Cook Inlet and is not authorized until it is properly justified for that area. Therefore, vessel owners/operators you represent are required to identify and contract with available resources to satisfy their vessel(s) national planning criteria for operations within Cook Inlet. 1-Call should consult with local stakeholders to determine availability and capability of resources when defining gaps in planning requirements for the vessels covered by the APC.
- c. This APC does not address why NPC is inappropriate in Prince William Sound (PWS), and is not authorized until it is properly justified for that area. Therefore, vessel owners/operators you represent are required to identify and contract with available resources to satisfy their vessel(s) national planning criteria for operations within Prince William Sound. 1-Call should consult with local stakeholders to determine availability and capability of resources when defining gaps in planning requirements for the vessels covered by the APC. 33 CFR 155.1065 requires a vessel owner/operator submit an APC to the COTP of the intended operating area.
- d. Vessels using this APC are restricted from operating north of 63 degrees north latitude.
- e. Vessels using this APC are restricted from transiting Shelikof Straight.
- f. Vessels using this APC cannot transit within 50 nautical miles from shore unless they notify the APC Administrator.

In addition, continued acceptance of the APC is contingent on the following conditions:

- a. Vessel owners/operators using this APC as part of their VRP must continue to undertake the required annual reviews per 33 CFR 155.1070, including applicable APCs. As APC Administrator, you are encouraged to ensure the alternatives employed by your APC are reviewed on your client's behalf.
- b. Upon receipt of this letter, you must provide to CG-MER an agreement between 1-Call Alaska and your client vessel owners/operators that satisfies the definition of "Contract or Other Approved Means" required by 33 CFR 155.1020. This agreement must support the immediate activation of resources

identified without the need for additional agreements/contracts.

- c. You must meet with the Western Alaska COTP annually to discuss APC status. This discussion must include a list of build out strategies prioritized by operating areas where vessels represent the highest risk. Build out items must include specific proposals and anticipated completion dates. Upon receipt of this letter, you must agree with WAK COTP on a date for this meeting.
- d. You must exercise all components of the APC along with a client's VRP by March 1, 2022 and report the results to the COTP.
- e. By July 1, 2021 you must demonstrate COTP WAK how 1-Call plans to track vessels of opportunity in real time to ensure availability to support an oil spill response.
- f. If vessels of opportunity identified in the APC are certificated by the USCG, you must ensure that they are capable and not limited by service, routes, or conditions. You must report back to WAK COTP by July 1, 2021 to confirm that everything is in order.
- g. You must identify additional temporary storage to enhance on-water oil recovery capability and reduce the capability gaps noted in the application and report back to WAK COTP by July 1, 2021.

Failure to adhere to these conditions to the satisfaction of the respective COTP may result in CG-MER revoking the APC acceptance and issuing deficiencies for all VRPs using the APC as authorization to operate in the covered area(s).

This APC, along with a copy of this letter, must be kept with your respective client's VRP. Your clients must maintain compliance with all other laws and regulations, including maintaining valid contracts in support of the resources provided in the APC. Any deviation from the provisions of this APC must be communicated in writing to the Western Alaska COTP for consideration. If it is determined that complying with a vessels required national planning criteria is achievable in areas where this APC is accepted, use of this APC for VRP approval may be denied.

Lastly, in 2020 the Coast Guard chartered the Maritime Oil Spill Response Plan Advisory Group (MORPAG) to research, conduct outreach, and recommend changes to current APC policy. This initiative is expected to take approximately two years. It is likely that any future applications for renewal of your APC may be subject to new policies, therefore I advise you to remain up-to-date on any pertinent Coast Guard policy changes.

Please contact Mr. Chris Friese with any concerns or questions at christopher.r.friese@uscg.mil.

Sincerely,



R. M. ALONSO
Captain, U. S. Coast Guard
Chief, Office of Marine Environmental Response Policy

Copy: CG PACAREA (3IM, 54)
CGD SEVENTEEN (dp, dr)
CG SECTOR Anchorage