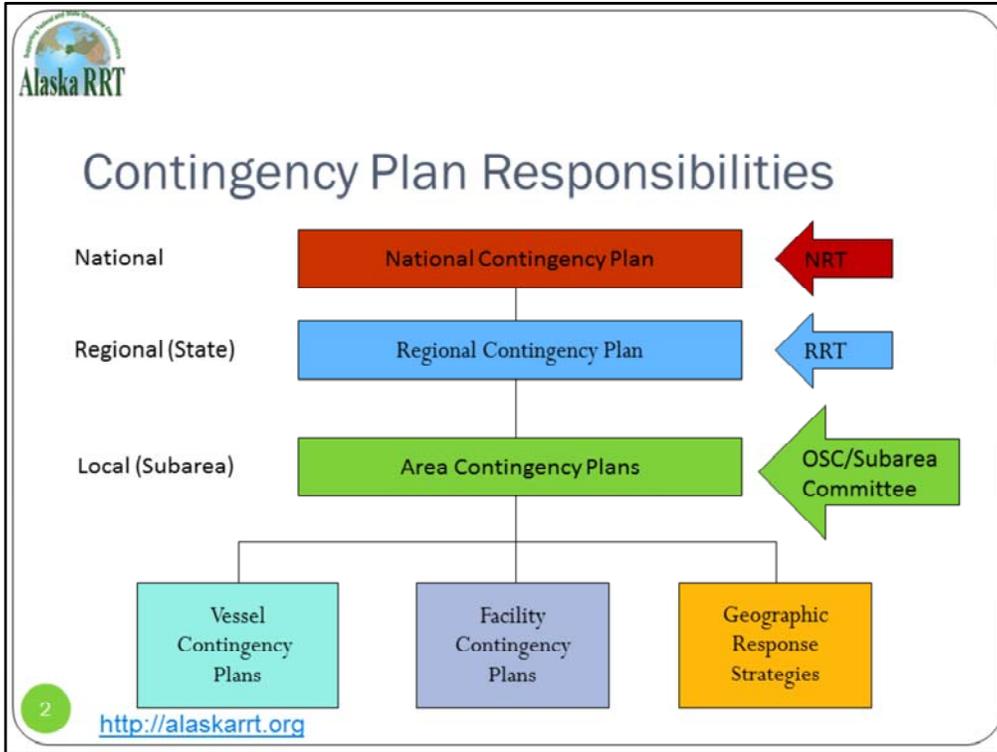
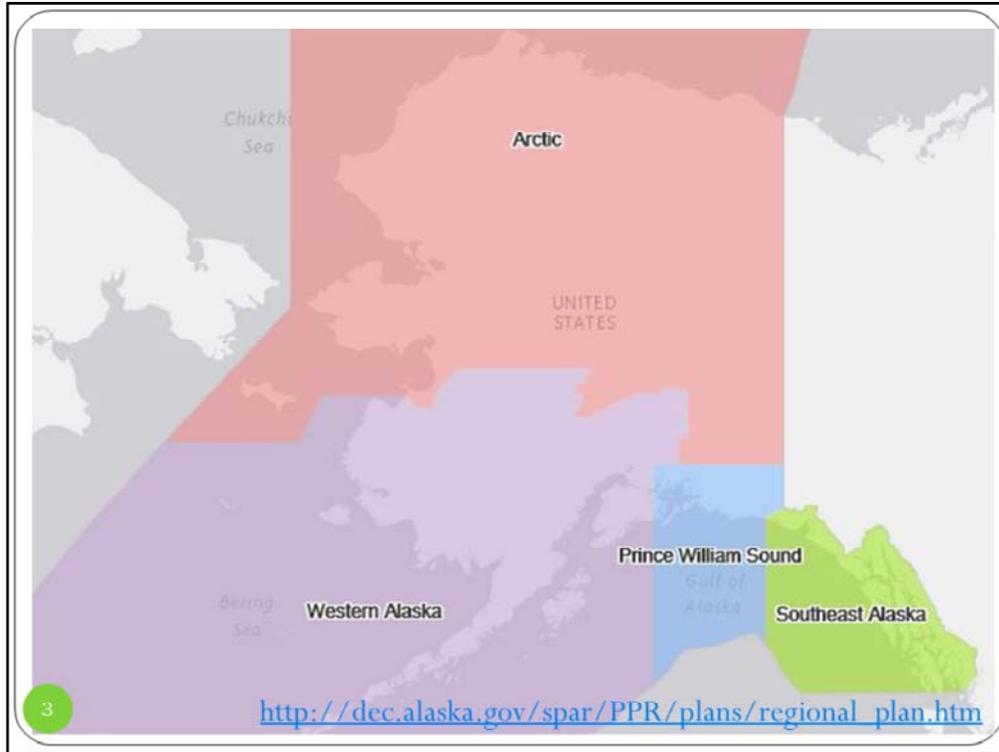


My name is Nick Knowles.

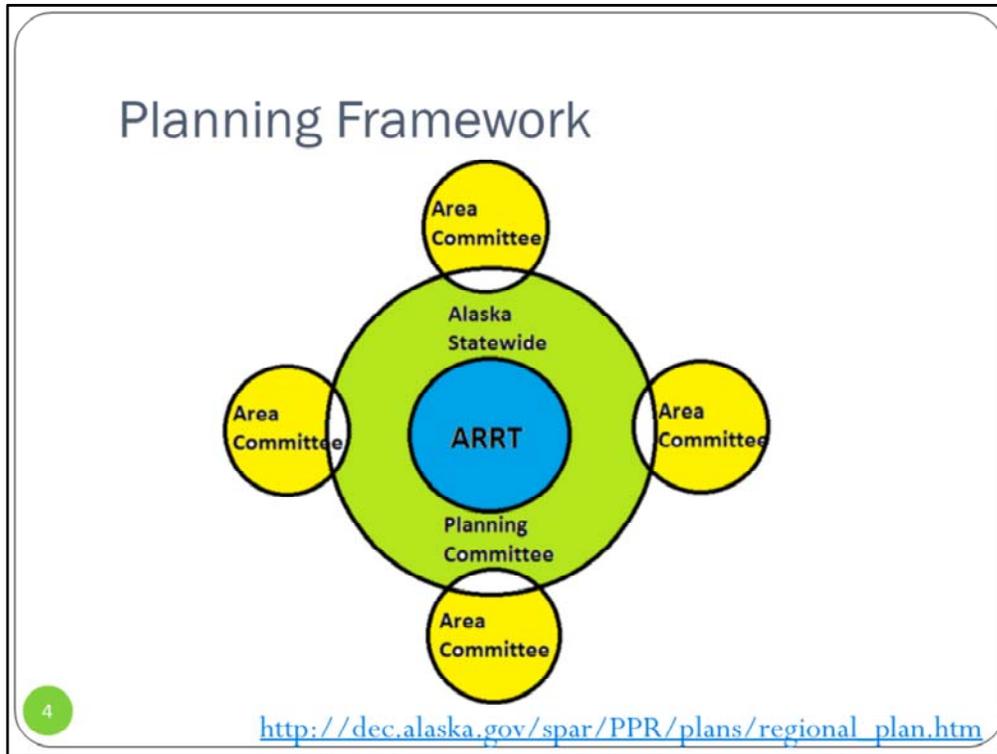
This briefing concerns the joint effort between ADEC, USCG, & EPA to restructure the framework of Spill Contingency Plans in Alaska.



Here you see the hierarchy of spill response plans as envisioned in the NCP.



Here you see the Area Planning boundaries that the task force proposed. However, in recent months, it's come to light that USCG HQ is asserting an interpretation of the NCP for which there can be only one FOSC for each ACP. As such, these boundaries will not pass muster with their requirements, and we are returning to the drawing board to achieve consensus among OSC's



Here is the framework we were working towards. The AK Statewide Planning Committee was to be made up of public servants who work in the area planning realm. The purpose would be to coordinate efforts between the Area Committees and the ARRT, and to ensure consistency across plans. This body will be charged with quantifying the level of effort required to get from where we are now and where we want to be, and determining whether resources are available sufficient to close that gap. In March, I sent out invitations to all the potential members to kick off with a conference call. Shortly thereafter, that effort had to be cancelled.

# USCG HQ Memo

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



Commandant  
United States Coast Guard

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Washington, DC 20593-7516  
Staff Symbol: CG-SR  
Phone: (202) 372-2011

16471

FEB - 2 2017

## MEMORANDUM

From: Charles W. Ray, VADM  
COMDT (DCO)

Reply to: J.B. Loring, CAPT  
Attn of: (202) 372-2231

To: CG LANTAREA (LANT-00)  
CG PACAREA (PAC-00)

Subj: AREA CONTINGENCY PLANNING REVITALIZATION

Ref: (a) National Contingency Plan, 40 CFR Part 300  
(b) Area Contingency Plan Organization, Content, Revision Cycle, and Distribution,

While this memo was issued in early February, I wasn't made aware of it until early March. Even then it was some time before we began to see that this could potentially derail our efforts to restructure our planning areas and plans. In mid-march we cancelled the effort to stand up the Statewide Area Planning Committee and starting working to schedule a meeting of the OSC's in conjunction with this meeting. The OCS's will meet tomorrow in Juneau.

## What the Memo Says



- COTP is to manage a “stand-alone coastal area ACP (and Area Committee) unique to the single COTP zone.
- USCG HQ will create new standardized contingency planning products, modernized templates, and more efficient processes, to achieve consistency nationwide.
- Numerous tasks to USCG Office of Marine Environmental Response
- Provides no timeline for compliance.

Read Bullet 1 – Alaska Plans and planning committees do not currently conform to that interpretation of the NCP.

Read bullet 2 – Over past few decades, EPA and USCG issued guidance directing changes and updates to the structure of ACP’s and RCP’s nationwide. Without getting into the reasons why, suffice it to say that most of these changes were not implemented in Alaska. But because of this we have a pretty good idea of what form standardized ACP’s will take (ICS format), and what their standardized contents will be. Given the tasking and resources, we could start work on this requirement.

Don’t Bullet 3 - Basically the remainder of the memo directs CG-MER to comply with existing regulations and re-vitalize the contingency planning program nationwide.

Bullet 4 – This is why we’re meeting Thursday. Neither D17 nor any of the COTP’s have advised what, if any, actions they intend to take regarding this memo.

## Work Completed to Date

- ~~Identify Proposed Planning Area Boundaries.~~
- Solicit Stakeholder Input on Overall Proposal.
- Propose Final Location of SCP/UP Components.
- Design Proposed Plans Structure. Draft Tables of Contents for ACP/RCP.
- Create Crosswalk Matrix to Illustrate Proposed Relocation of Plan Components from Existing Plans to Proposed Plans.

[http://dec.alaska.gov/spar/PPR/plans/regional\\_plan.htm](http://dec.alaska.gov/spar/PPR/plans/regional_plan.htm)

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The Area Planning Task Force consists of myself, LCDR Matt Hobbie, Senior CPO Tiffany Wright of Sector Anchorage, and Shannon Miller of ADEC. The documents that we have produced have all been posted to the State's ADEC website. Note that planning area boundaries were previously approved, but have now been called into question.

## Remaining Work

- Identify ACP Boundaries (OSC's)
- Form and Convene Alaska Planning Committee
- Identify Workgroup Members for RCP and Each ACP
- Determine Resources Required/Available to Draft New Plans
- Identify ancillary documents that will need updating if plans are altered (MOA/MOU's, GRS's, etc...)
- Produce Final Timeline for Creation/Promulgation of New Plans
- Draft New Plans
- Solicit Public Comment on Draft Plans
- Promulgate New Plans

[http://dec.alaska.gov/spar/PPR/plans/regional\\_plan.htm](http://dec.alaska.gov/spar/PPR/plans/regional_plan.htm)

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Currently all work on this effort is on hold, until we have at least a conceptual model of what geography each of the ACP's will cover. Bullets 3 through 7 would all fall to the Statewide Area Planning Committee to accomplish. We hope that the OSC's will achieve consensus tomorrow, but if not, we will continue with the Unified Plan/Subarea Plan framework as it currently exists.

# QUESTIONS?

State of Alaska website:

[http://dec.alaska.gov/spar/PPR/plans/regional\\_plan.htm](http://dec.alaska.gov/spar/PPR/plans/regional_plan.htm)

ARRT website

<http://alaskarrt.org>

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*USEPA*

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At this time I'd be happy to answer any questions.