

April 10, 2017

Docket No. USCG–2016–0437: Update to Alternative Planning Criteria (APC) National Guidelines.

Attention: U.S. Coast Guard and U.S. Department of Homeland Security

On behalf of the Pacific States/British Columbia Oil Spill Task Force (Task Force), I am submitting comments regarding the Update to Alternative Planning Criteria (APC) National Guidelines. The proposed updates to the guidelines would provide additional information to states on developing and submitting APC requests.

The Task Force consists of a coalition of West Coast states (Alaska, California, Hawaii, Oregon and Washington) and the Province of British Columbia, that share a common goal of protecting the region's natural resources and communities from oil spills. Over the past 25 years, the Task Force has been a collective voice from the West Coast on a range of national policies related to oils spill prevention, preparedness and response.

With regard to the pending updated APC National Guidelines, the Task Force offers the following comments and recommendations, some specific to Alaska (a Task Force Member):

- Ensure any approved APC's can provide service to the entire Captain of the Port (COTP) zone. This will ensure areas of the state with less traffic are also receiving some minimal protection. That would achieve the overall intent of the APC process by increasing response assets in areas where they don't exist.
- In the guidance, clarify that salvage and marine firefighting cannot be blended with response action.
- The guidance should provide clear criteria for the approval, rejection, and revocation of APCs.
- APC approval should take place at the Sector level. This will ensure that the close coordination with local stakeholders and the APCs themselves.
- Requests for APCs in Alaska, where approved OSROs are already in place, should not be approved or even considered.
- The State of Alaska should be involved in the approval of APCs, and in the inspection process once they are approved.
- APCs should be defined as temporary, and the U.S. Coast Guard should indicate how response gaps are being closed to ensure compliance with OPA 90.

- Approved APCs should incorporate prevention measures, such as vessel monitoring and tracking, to mitigate gaps between the available response resources

We believe consideration of these recommendations would improve the capacity of the APC to provide adequate protection in remote regions where response assets are limited.

Respectfully submitted,

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