

U.S. Department of
Homeland Security

United States
Coast Guard



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Serial No. 478

FEB 2 2012

Marine Exchange of Alaska
Attn: Captain Edward E. Page, USCG (ret)
1000 Harbor Way, Suite 204
Juneau, AK 99801

Dear Captain Page,

This letter is to document the Coast Guard's acceptance of your proposed Alternate Planning Criteria (APC) for vessels carrying OPA-90 regulated cargos in the COTP zone Western Alaska. The provisions of your May 2011 *Western Alaska Alternate Planning Criteria for Oil Tankers Operating in Western Alaska (WA-APC-T)* offers a viable response posture. The Marine Exchange of Alaska is to be commended for the development of this document.

The *WA-APC-T*, along with a copy of this letter, is to be incorporated into vessel response plans as a separate appendix. The acceptance of this APC shall remain valid for one year from the date of this letter.

The gap analysis contained in your proposal highlights the fact that the sole OSRO does not have sufficient response capabilities in the Western Alaska zone to meet the tank vessel oil spill response planning requirements of OPA-90. Further, the distances and low volume of commercial traffic mitigate against a demand for immediate build-up of resources to OPA-90 levels. The Coast Guard will temporarily accept this gap for one year because your proposal indicates that oil spill removal/recovery equipment available through the Alaska Chadux OSRO will be augmented by increased risk reduction measures including traffic routing, immediate notification of hazardous conditions; and through enhanced prevention / response situational awareness capabilities available through the Automatic Identification System and satellite vessel tracking.

The Coast Guard will accept this APC, recognizing that the combined use of OSRO resources and enhanced preventive measures will increase environmental protection of the area. This approval reflects the recognition that full compliance with oil spill regulations is not practicable and in some cases not the only means of protecting the environment in Alaska. Most past maritime casualties and oil spills in Alaska outside protected waters have been the result of vessels running aground in remote areas with the oil impacting the shore in a matter of hours.

I commend you for your creative and ambitious efforts in preparing this proposal for response planning. I encourage the Marine Exchange to continue to consult with the Coast Guard and

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other industry partners to improve upon the provisions contained in this alternate planning criteria prior to its expiration.

Sincerely,



ERIC P. CHRISTENSEN
Captain, U.S. Coast Guard
Chief, Office of Vessel Activities

Copy: PACAREA (P-34)
Commander, Coast Guard District 17 (dr, dp)
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