COASTAL AREA CONTINGENCY PLAN (ACP) HANDBOOK

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UNITED STATES COAST GUARD

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While the USCG will attempt to keep links to information operational and accurate, the Agency makes no expressed or implied guarantees. The USCG expects to review this Handbook routinely and update the links listed in the appendices as appropriate.

Acknowledgement

This document was created by the Coastal Area Contingency Plan Workgroup, Task Force 3. It was primarily authored by Ms. Elisha Cook, Mr. Jereme Altendorf, and CDR Matt Richards. Special thanks to all that provided input to this product, especially Ms. Demara Oos and Mr. Bill Marhoffer.

Record of Change

Maintenance of this Handbook is the responsibility of the Office of Marine Environmental Response Policy (CG-MER). The most current version of the plan will be posted on the CG-MER SharePoint site.

2025 EDITION

Change Number	Date of Change/Review	Person & Agency Making Change	Description of Change/Update

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Introduction

This Handbook is a guide and reference for the development of coastal Area Contingency Plans (ACPs) for environmental emergencies. While it is primarily intended for use by United States Coast Guard (USCG) marine environmental preparedness and response program personnel, area contingency planning is necessarily an interagency and intergovernmental process, and the use of this Handbook to inform other agencies of USCG's planning process is encouraged.

Because ACPs are focused on specific geographic domains with many physical and jurisdictional variables, there are differences from area plan to area plan; however, maintaining national consistency in how the content is organized is important, particularly considering the statutory and regulatory requirements by which USCG and other agencies are bound. Furthermore, USCG personnel are deployable nationwide, making standardized plan organization across the country very important.

This Handbook was initially developed by the USCG's Coastal Area Planning workgroup, which met during calendar year 2024. It incorporates the accumulated knowledge of years of contingency planning experience. Although coastal ACPs are specifically mandated by the Clean Water Act (CWA) as amended by the Oil Pollution Act of 1990 (OPA 90), the USCG's responsibilities under other laws, including the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), make an all-hazards approach to contingency planning desirable. The processes of planning for responses to all types of environmental emergencies (e.g., oil discharges, hazardous substance releases, natural disasters) share common elements that have proven successful in major responses.

In the interests of conciseness and accessibility, this Handbook will not contain extensive portions of related documents, but will list key references, including laws, regulations, and technical resources, in appendices.

This Handbook is available for download as a PDF file from USCG's Office of Marine Environmental Response (CG-MER) website at:

www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Response-Policy-CG-5R/Office-of-Incident-Management-Preparedness-CG-5RI/Marine-Environmental-Response-CG-MER/.

Chapter 1: Overview of Area Planning

A. What is an Area Contingency Plan?

An ACP is a guidance document prepared for use by all agencies engaged in responding to environmental emergencies in a defined geographic area. Under federal law (OPA 90) and regulation (National Oil and Hazardous Substances Pollution Contingency Plan, commonly referred to as the National Contingency Plan or NCP), all U.S. territory is divided into jurisdictional zones for purposes of removal and response actions. Section E of this chapter provides details on applicable statutory and regulatory authorities.

An ACP is not a rigid, prescriptive plan with step-by-step instructions for responses. Rather, it serves as a mechanism to ensure responders have access to essential area-specific information, as well as to promote interagency coordination as a means of improving response effectiveness.

The USCG is designated as the lead agency for planning and response in the coastal zone and certain major inland water bodies, and the U.S. Environmental Protection Agency (EPA) is designated as the lead for the inland zone. For both the inland and coastal zones there are certain exceptions for scenarios managed by the Department of Defense (DoD) or Department of Energy (DoE). While this USCG Handbook is focused on coastal zone planning, USCG-led coastal plans and EPA-led inland plans covering adjacent areas must be compatible.

B. How is an ACP developed?

An ACP is the product of a collaborative process involving interagency representatives within the defined area, organized as an Area Committee (AC). Under the direction of the Federal On-Scene Coordinator (FOSC) for its area, in accordance with 33 USC § 1321(j)(4) and 40 CFR § 300.205, the AC is comprised of members from qualified personnel of federal, state, and local agencies, as well as members of federally recognized tribes, where applicable. The AC may also include nongovernmental (NGO) members as “participants” who provide input but do not have decision-making authority. The AC provides a forum for these agencies to develop cooperative working relationships while identifying issues and challenges through preplanning of joint response efforts and developing solutions in advance of a response. The AC is responsible for developing the ACP, evaluating its implementation, integrating documented lessons learned (LL), and maintaining it through a continuous improvement process by consulting with Regional Response Teams (RRTs) and others. One of the primary roles of the RRTs is to provide guidance to ACs, as appropriate, to ensure regional consistency and alignment of ACPs with the respective Regional Contingency Plan (RCP, see Section F for more details) and national policy.

ACPs shall be reviewed annually by the AC, led by the designated FOSC to validate, at a minimum, the accuracy of plan elements, such as contact information and worst-case discharge (WCD) scenarios. Plan reviews shall incorporate LL from exercises or incidents and identification of any

gaps in the plan. Chapter 6 provides recommendations and/or requirements for a standardized plan review and modification process.

C. How can exercises be used to evaluate the effectiveness of the ACP?

The National Preparedness for Response Exercise Program (PREP) plays a crucial role in improving ACPs by providing a practical and controlled environment to test response strategies, identify gaps, and enhance coordination among agencies. PREP exercises are designed to evaluate the effectiveness of communication channels, resource allocations, and decision-making processes. The exercise evaluations inform revisions to the ACPs, ensuring that the plans are more comprehensive, realistic, and tailored to the specific risks and conditions of the area. This continuous feedback loop leads to stronger preparedness and response capabilities. Chapter 6 provides additional details regarding exercises, including the collaboration between CG-MER and the USCG Office of Emergency Management and Disaster Response (CG-OEM).

D. What are the benefits of an ACP?

Responding to an environmental emergency can be a challenging task. Overlapping jurisdictions and potentially divergent interests of the parties involved may further complicate the response. The ACP provides a planning mechanism for potential complications prior to an incident. The ACP is an invaluable tool for responders, providing practical and accessible information about how to effectively respond, including what they need to know and essential points of contact.

The AC provides a forum for all parties to identify problems, resolve conflicts, and learn about the issues raised by actual and potential incidents. It allows for communicating and informing a wide audience about response and planning concepts as part of the National Response System (NRS).

> *The NRS is the government's mechanism for emergency response to discharges of oil and releases of hazardous substances, pollutants, or contaminants. The NRS functions through a network of interagency and intergovernmental relationships that are formally established and described in the NCP as found in 40 CFR Part 300.*

The AC also provides an opportunity for governmental members and NGO participants to define their most significant concerns, ensuring that those concerns will be considered should a response be initiated or required.

While the process of managing the ACP via an AC in the coastal zone is a USCG-led effort, the responsibility is not solely that of the USCG. The AC and ACP are joint, interagency efforts; the USCG relies on collaborative efforts with federal, state, local, and industry partners to develop ACPs, leveraging their subject matter expertise and support to ensure comprehensive planning. The interagency process and coordination for ACP development is as beneficial as the ACP itself, as it helps to improve communication and deconflict roles and responsibilities prior to an actual event.

E. What are the statutory and regulatory underpinnings of the ACP?

There is a substantial foundation of laws, regulations, and executive orders that provide the basis for ACPs. Below are key statutory and regulatory underpinnings that include the year of establishment for each in parenthesis. Because there have been numerous amendments since the original establishments, it is important to review current versions. Current versions of United States Code (USC) can be found via the Office of the Law Revision Counsel, and the Code of Federal Regulations (CFR) via the National Archives.

Clean Water Act (1972): The CWA amended the Federal Water Pollution Control Act (FWPCA) of 1948 and expanded the Federal Government's authority to regulate discharges to waterways. The Water Quality Improvement Act, amended by the FWPCA, provided the basis for the NCP. The CWA requires establishment of ACs and contains specific requirements for what must be included in ACPs; see 33 USC § 1321(j)(4).

Oil Pollution Act of 1990 (1990): The OPA 90 amendment to the CWA established requirements for ACPs to address WCDs of oil and hazardous substances and mandated Facility Response Plans (FRPs) for certain categories of facilities.

Comprehensive Environmental Response, Compensation, and Liability Act (1980): CERCLA established a federal emergency response program to deal with immediate threats from hazardous substances and pollutants or contaminants (excluding petroleum as provided by 42 USC § 9601(14) and (33)) and a remedial response program to deal with hazardous waste sites requiring actions consistent with a permanent remedy.

Emergency Planning and Community Right-to-Know Act (1986): EPCRA amended CERCLA by adding requirements for community-based emergency planning, through State Emergency Response Commissions (SERCs), Local Emergency Planning Committees (LEPCs), and public disclosure of hazards associated with certain facilities.

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (1988): The Stafford Act provides the authorities and funding for federal support to state and local entities in responding to major disasters and emergencies. This includes significant operational requirements based on activation of specific emergency support functions for which the USCG is predesignated as either the primary or secondary responsible agency (e.g., Emergency Support Function #10).

National Response Framework (2008): The NRF is the federal executive document that provides the national blueprint for how the Nation conducts all-hazards response.

National Oil and Hazardous Substances Pollution Contingency Plan (1968): Commonly referred to as the NCP, this is a federal regulation that codifies certain authorities and responsibilities of designated federal agencies for responding to releases of oil, pollutants, and hazardous substances. The NCP requires each federal region, through its RRT, to develop RCPs. Under the direction of the FOSC and subject to the approval by the lead agency, each AC, in consultation

with the appropriate RRTs, shall develop an ACP for its designated area. For specific requirements related to federal contingency plans, see 40 CFR § 300.210.

Executive Order 12580 (1987): EO 12580 implements CERCLA, including delegating lead response authorities to EPA and USCG and requiring the NCP to provide for national and regional response teams (i.e., National Response Team (NRT) and RRTs).

Executive Order 12777 (1991): EO 12777 implements OPA 90 by outlining emergency response procedures for discharges of oil and hazardous substances, including delegating authority to designate areas, appoint AC members, determine the information to be included in ACPs, and review and approve plans for the inland zone to the EPA Administrator and for the coastal zone to the Secretary of Homeland Security.

Presidential Directives: Homeland Security Presidential Directives (HSPDs) and Presidential Policy Directives (PPDs) are executive orders that address specific issues. HSPD-5 covers incident management and requires the establishment of the National Incident Management System (NIMS). PPD-8 focuses on improving the overall preparedness of the Nation to respond to emergencies; PPD-8 replaced HSPD-8. PPD-21 addresses the protection of the Nation's critical infrastructure; PPD-21 revoked HSPD-7.

State, Local, and Tribal Laws/Codes: Each state, territorial, local, and tribal entity has its own laws, codes, ordinances, and regulations that apply to environmental emergencies. These entities identify which agencies and requirements are relevant to the ACP.

F. What is the relationship of the ACP to other plans?

The NCP is the foundation for environmental contingency planning, and outlines the authorities, responsibilities, and relationships of agencies when responding to environmental emergencies.

RCPs extend the NCP model to a narrower regional focus, bringing in states, tribes (as applicable), and other entities to focus on region-specific concerns in both the inland and coastal zones. Coastal ACPs also interface with plans developed by state and local authorities, and by vessel and facility owners/operators, as well as with other ACPs in bordering jurisdictions, to include inland ACPs managed by the EPA.

There are three levels of contingency plans under the NRS: NCP, RCPs, and ACPs. The relationships between these plans and other planning mechanisms are illustrated in Figure 1 below.

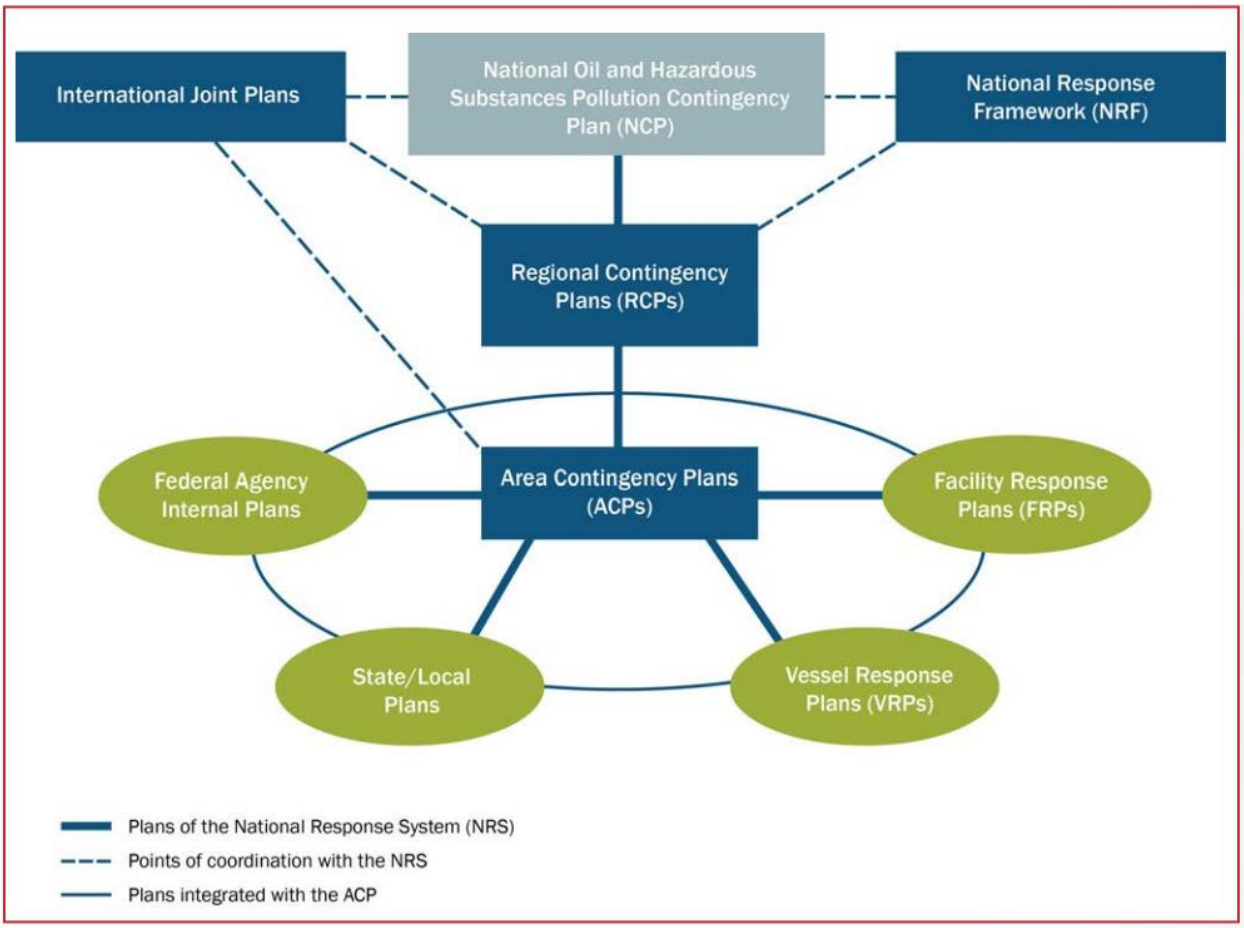


Figure 1: Relationship of Plans (40 CFR § 300.210)

Chapter 2: Baseline Plan Review & Analysis

Area contingency planning is crucially dependent on being iterative and collaborative through interagency partnerships. The dynamic nature of emergencies and disasters necessitates continuous reassessment and refinement of contingency plans to ensure they remain relevant and effective. Iterative planning allows for incorporating LL from past incidents and adapting to evolving threats and vulnerabilities. Collaboration among multiple agencies brings together diverse expertise, resources, and perspectives, essential for comprehensive and holistic planning. Interagency cooperation fosters a unified response framework, enabling seamless coordination during crisis situations and optimizing the allocation of resources. Partnerships built through iterative planning enhance communication channels, establish clear roles and responsibilities, and cultivate trust among stakeholders, which are vital for swift and effective decision-making under pressure. These approaches to area contingency planning ensure preparedness and resilience in the face of adversity.

A. Plan Review Key Factors

Because the ACP is a community plan, it is important to ensure a collaborative review process. When reviewing the plan, it is important for the AC to keep in mind that, per 40 CFR § 300.210, ACPs shall be adequate to remove a WCD and to mitigate or prevent a substantial threat of such discharge from a vessel, offshore facility, or onshore facility operating in or near the area.

The following is a non-exhaustive list of key factors to consider during an ACP review:

- Inventory and assessment of existing plans, including the RCP and any other federal, state, regional, and local plans; and an assessment of the effectiveness of these plans, including the identification of gaps and other inadequacies that could be remedied.
- Identification of potential geographic zones within the ACP boundaries that may require special attention (i.e., development of a non-standard geographic zone annex to the ACP).
- Review of data and information from past incidents (e.g., after-action reports (AARs), LL, unresolved issues). This review is to identify specific problems that an updated ACP should address or incorporate, including corrective action items.
- Validation of sensitive areas, including environmental, cultural, and economic resources.
- Identification of potential jurisdictional overlaps/conflicts.
- Validation of high-risk facilities and critical infrastructure.
- Assessment of natural disaster risk and impact.
- Estimates of the time and resources required for updating the ACP.

- Assessment of key qualified personnel of federal, state, and local agencies, and federally recognized tribes, where applicable, that should be invited to participate in the ACP.
- Identification of critical gaps or outdated elements in the plan that could hinder effective response during emergencies or disasters to prioritize sections for further development.

B. Plan Review Cycles

In addition to the USCG requirements for reviews listed below, each corresponding state may have additional review requirements that should be identified in the plan.

Area planners must recognize that plan updates and revisions are specific requirements that are not interchangeable. By ACP design, area planners should make necessary modifications throughout an annual update and five-year revision cycle to minimize inaccuracies and errors. Figure 2 below shows the ACP 5-year Review Cycle and schedule.

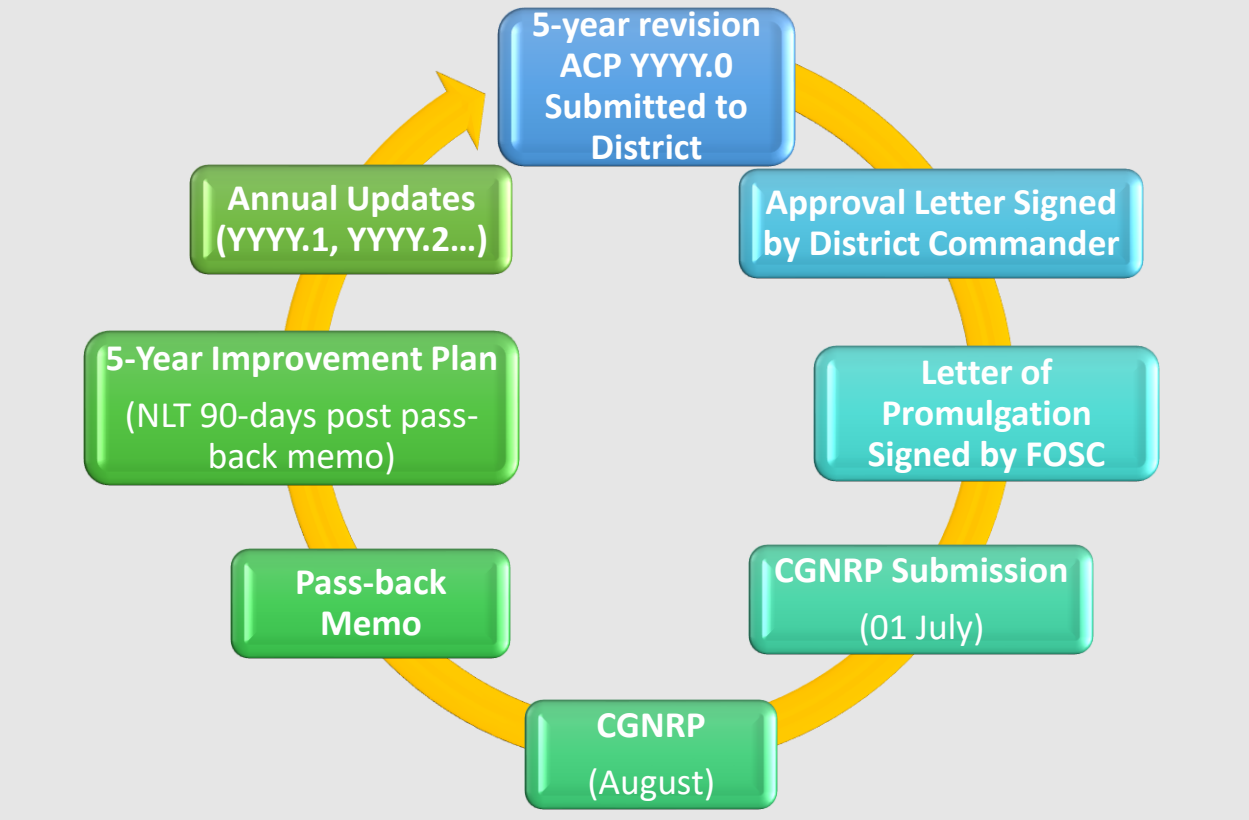


Figure 2: ACP 5-year Review Cycle

Annual Updates

Annual updates address immediate needs, such as correcting errors, incorporating new information, or adjusting procedures based on recent experiences or changes in regulations. In

addition to routine data, formatting, grammar and/or hyperlinks, the FOSC must ensure, at a minimum, that the annual update process addresses the following:

- Validation of contact information
- Incorporation of LL from exercises or real-world incidents
- Validation of Geographic Response Strategies (GRS) data, as needed
- Validation that WCD scenarios are up-to-date and remain relevant
- Validation of threatened and endangered species lists
- Identification of any gaps
- Resolution of any emergent issues
- Incorporation of recommended actions from the 5-year Improvement Plan.

5-Year Revisions

As mentioned, each ACP goes through a 5-year revision process that includes an in-depth review and comprehensive overhaul to formally approve and promulgate an updated plan. The revision process incorporates feedback and LL from the previous 5 years, including recommendations identified by the Coast Guard National Review Panel (CGNRP) and improvement actions prescribed in the resulting 5-year improvement plan, LL from exercises or real incidents, changes in resources, and greater knowledge of evolving threats and risks.

The process involves reviewing and validating the existing plan, identifying areas that require change, and implementing those changes to improve the plan's effectiveness and relevance. Revising the plan ensures that it remains current and capable of addressing the latest challenges and operational needs. Once the 5-year revision is complete, it is sent to the respective District Commander for review and approval. Once approved, the plan is then promulgated by the FOSC.

See Chapter 6 for detailed information on the plan validation process, including submission of the approved and promulgated ACP for review by the CGNRP, which kicks off the next 5-year revision process. Additional information and requirements for the annual update and five-year revision, including the CGNRP process, can be found in the Marine Environmental Response and Preparedness Commandant Instruction (MERP), COMDTINST 16000.14 (series).

Note: *The difference between plan updates and plan revisions lies in their scope and purpose. Plan updates involve making specific changes to certain sections of an ACP, often to address immediate needs, correct errors, or incorporate new information based on recent experiences or changes in regulations. In contrast, plan revisions are more comprehensive, involve a thorough review and revision, and are driven by broader changes such as evolving risks, new technologies, or organizational shifts, ensuring the plan remains fully current and effective.*

Chapter 3: Area Committee Management

Coastal ACP managers must balance multiple aspects of AC management to ensure the success of their ACs, including:

- Development and maintenance of a robust membership
- Productive and continuous engagement with members
- AC organization (i.e., executive steering committees and subcommittees)
- Development of strategic direction and project management oversight
- Best practices for coordinating all aspects of committee work and meeting logistics.

The Sector Organization Commandant Instruction (COMDTINST) 5401.6 (series), identifies Emergency Management and Force Readiness (EMFR) staff as the typical lead for AC and ACP management, with the Incident Management Division (IMD) providing support. EMFR and IMD staff are expected to work together to meet the overall objectives of AC projects. EMFR and IMD staff should coordinate extensively, at all rank levels. For those units that have a Marine Safety Specialist Response (MSSR) billet, this position should take a lead role in coordination between IMD and EMFR staff on all MER-related issues, to include AC management, participation, and support coordination. Generally, Sector emergency managers and pollution responders must work together within ACs to develop ACPs that enhance the effectiveness of federal and state-level emergency response efforts. By integrating resources, conducting joint training exercises, and sharing intelligence, they ensure a unified and coordinated response to incidents. This collaboration helps streamline communication, improve response times, and ensure compliance with both federal and state environmental regulations.

Additionally, this chapter emphasizes the need for the USCG to continuously excel in interagency oil and hazardous substance planning and preparedness, by focusing on the concept of "Joint Planning without Joint Plans." While the USCG leads the coastal AC, it should not manage projects independently. Instead, the Committee's structure should reflect the local context and strive for interagency workflow efficiencies. AC projects are inherently interagency, and AC Managers may face challenges when coordinating tasks across multiple government agencies. Planners may address these challenges by forming additional expert groups to complete tasks and enhance broader coordination efforts to reduce duplication and inefficiencies. Any additional planning coordination groups are not decision-making bodies.

There are many ways to conduct Area Committee management, either via proactive engagement of the RRT Executive Committee, coordination and oversight by District Staff elements (e.g., District Response Advisory Teams, Incident Management Preparedness Advisors (IMPAs), and emergency management staff), or development of Statewide Planning Committees (SPCs).

As an example, regional and area planners in Alaska, representing both federal and state NRS agencies, created the Statewide Planning Committee (SPC). This Committee is a collaborative effort between Alaska NRS agencies to share resources, expertise, and information, leveraging each agency's resources to prevent communication gaps in contingency planning. The SPC is not a decision-making body; it responds to goals, objectives, and projects agreed upon by individual ACs and the Alaska (AK) RRT. Alaska planners then execute these directives and share information across the state. The AK SPC was established by AK agency planners to ensure consistency in AC efforts statewide.

A. Area Committee Composition

AC participation is critical for effective oil and/or hazardous substance preparedness and response. An AC with diverse participation ensures that the committee has the expertise and local knowledge necessary to develop and implement effective spill response plans tailored to the specific needs and risks of their areas.

OPA 90 identifies the staffing for ACs as "qualified personnel of federal, state, and local agencies" but should also include federally recognized tribes, where applicable. These committees are typically comprised of representatives from the following agencies and organizations:

Members: These are federal, tribal, state, and local government employees who are appointed in writing by the FOSC and the SOSC(s) and represent the interests of the government agencies that employee them.

- **Federal Agencies:** This includes the USCG, EPA, National Oceanic and Atmospheric Administration (NOAA), Department of the Interior (DOI), U.S. Fish and Wildlife Service (USFWS), and other federal entities with responsibilities related to oil spill response and environmental protection to include other existing RRT member agencies.
- **Federally Recognized Tribal Authorities (where applicable):** Representatives from tribal governments and organizations if the area includes tribal lands or has potential impacts on tribal resources.
- **State Agencies:** State On-Scene Coordinators (SOSCs), and state-level environmental, emergency management, and natural resource agencies that have jurisdiction and responsibilities within the area. The lead state agency representative to the RRT should identify other state agencies with interest and expertise relevant to ACP development.
- **Local Agencies:** Local government entities such as city or county emergency management departments and public safety organizations. LEPCs within the area should be the initial contact point for developing a list of potential participants.

Participants: These individuals are representatives from industry, OSROs, environmental stakeholders, academia, and NGOs. These members are limited in the positions they may serve within the AC organizational structure.

- **Industry Representatives:** Organizations or companies involved in the oil and gas industry to include oil spill removal organizations (OSROs), particularly those operating in the region, including those responsible for spill response and mitigation.
- **Academia:** Partnerships with academic and research institutes, such as universities, aquariums, or nonprofit environmental research and education institutes, can significantly advance the integration of spill response science and technology into future spill preparedness and response efforts. Leveraging their expertise can enhance understanding and capabilities in spill response, foster innovative approaches, and drive improvements that add substantial value to how we manage and respond to spills.
- **Environmental/Community Groups:** NGOs and community groups that have an interest in environmental protection, public health, and local resource management.

Observers: These individuals make up a broad spectrum of interests not already represented above. They are members of the public and individuals that have a specific interest relevant to any given AC topic. They cannot serve on any AC subcommittees but may provide input or comments relevant to a specific AC issue.

B. Project Management

Project management principles are the foundation to interagency management of AC planning and preparedness initiatives due to complexity, scale, and limited resources. Effective project management ensures that AC planning and preparedness projects are completed on time, using existing resources, and meet their intended objectives. This is particularly important given the urgency of addressing NCP-specific issues such as in-situ burn (ISB), dispersants, and overall response planning with industry, stakeholders, and NGOs. By applying structured project management methodologies, federal and state agency planners can prioritize tasks, allocate resources efficiently, and minimize risks, leading to more successful area planning and preparedness outcomes.

Project Management Principles:

- *Defined Goals*
- *Timelines*
- *Stakeholder Engagement*
- *Performance Tracking*

One of the primary benefits of project management in environmental protection is enhanced coordination and collaboration. Environmental projects often involve multiple stakeholders, including federal, tribal, state, and local agencies, nonprofit organizations, private-sector partners, and the public. Project management principles facilitate clear communication, define roles and responsibilities, and establish a framework for stakeholder engagement. This collaborative approach is essential for ensuring that all parties are aligned with project goals and can contribute their expertise and resources effectively.

Furthermore, project management provides a systematic approach to monitoring and evaluation, which is vital for environmental protection initiatives. Through regular progress tracking, performance metrics, and impact assessments, project managers can ensure that environmental projects are on course to achieve their objectives. This process allows for the early identification of issues and the implementation of corrective actions. Additionally, robust monitoring and evaluation frameworks enable the Federal Government to demonstrate accountability and transparency to the public and other stakeholders.

In addition, environmental projects are often subject to various uncertainties, including regulatory changes, technological advancements, and environmental hazards. By implementing comprehensive risk management strategies, project managers can anticipate potential challenges and develop contingency plans to mitigate their impact. This proactive approach helps to safeguard the project's integrity and sustainability, ensuring that environmental protection efforts are resilient and adaptable to changing circumstances.

There are a variety of simple project management resources available that can enhance efficiency and effectiveness, including CG-OEM's Comprehensive Job Aid for Emergency Management Staffs efficiently, ensure compliance with regulations, and achieve environmental objectives.

C. Area Committee Organization

Establishing a consistent AC organizational structure is crucial for maintaining effective interagency coordination. One of the most persistent concerns raised by civilian agencies, industry stakeholders, and preparedness partners, both currently and historically, is the challenge of continuity caused by the frequent rotation of USCG personnel. The annual transfer of a significant portion of USCG active-duty members may disrupt institutional knowledge, create inconsistencies in decision-making, and strain long-standing relationships with interagency partners. Where possible, units should establish a civilian Emergency Management Specialist position responsible for the management and oversight of the AC and ACP.

Government reports, including those from the Government Accountability Office (GAO) Report 20-554) and the Congressional Research Service (CRS) Report *Oil Spills in U.S. Coastal Waters, Background, Governance, and Issues for Congress*), have repeatedly highlighted how personnel shifts impact mission readiness, regulatory enforcement, and marine safety operations. Post-9/11 organizational changes, the expansion of the USCG's security responsibilities, and resource

reallocations have further compounded these challenges, particularly in marine inspections (see *Challenges Facing the Coast Guard's Marine Safety Program, Congressional Testimony 2AUG07*) and environmental response programs. Incident-specific preparedness reviews, such as those conducted after Deepwater Horizon (see January 2011 *BP Deepwater Horizon Oil Spill Final Report*), have also noted that the loss of experienced personnel due to rotations can weaken preparedness efforts. Addressing these continuity gaps ensures that ACs function efficiently and that the USCG remains a reliable and effective partner in environmental protection and emergency response. USCG AC Managers and/or project managers should strive to ensure detailed 'pass downs' occur and include time for new personnel to get up to speed on ongoing projects.

AC Managers should review the latest Marine Environmental Response and Preparedness Policy for AC organizational requirements, roles and responsibilities, and best practices.

Area Committee Managers (or Secretary): The USCG, as the FOSC and Chair of the AC, should appoint an AC Manager (or Secretary). This position will normally be staffed by the EMFR Chief or in some instances, the IMD Chief. The AC Manager is responsible for management of the AC, to include:

- Drafting and updating charters
- Managing subcommittees
- Developing meeting schedules, agendas, and logistics
- Updating the ACP
- Coordinating projects with adjacent ACs and the RRT.

Executive Steering Committee (ESC): The ESC is typically made up of the FOSC and SOSC(s), and other key partners (e.g., NOAA, DOI). However, this group may differ from area to area to include tribal or local representatives. This group should be established in a charter which identifies meeting requirements, responsibilities, and task deadlines.

D. Executive Steering Committee Activities

The effectiveness of the AC's ESC hinges on its ability to provide clear direction, ensure good governance, and foster an environment of accountability and support for the program(s) and project(s) it oversees.

Key Roles and Responsibilities

The AC's ESC plays a crucial role in guiding the strategic direction and governance of organizational elements and projects.

Strategic Oversight: The ESC provides high-level strategic guidance, ensuring that the project or program aligns with the overall objectives of the AC. It sets strategic priorities, reviews progress, and adjusts strategies as necessary.

Decision-Making: The ESC serves as the primary decision-making body for significant issues related to AC projects or subcommittees, such as approving changes to scope, resource needs, and key project milestones. It works to resolve conflicts and make decisions to keep projects on track.

Resource Allocation: The ESC oversees the allocation of resources, ensuring that projects or subcommittees have the necessary personnel, tools, and funding (as applicable) to succeed. It assesses resource needs and allocates accordingly.

Risk Management: The ESC ensures that risk management processes are in place and that major risks are reported and addressed. A critical role of the ESC is to identify, evaluate, and mitigate risks associated with a project or subcommittee.

Performance Monitoring: The ESC monitors the performance of projects or subcommittees through regular updates and reports from project or subcommittee leads. It evaluates performance against set goals and objectives to ensure accountability and transparency.

Stakeholder Communication: The ESC facilitates communication between different stakeholders, including subcommittees, AC members, external partners, and potentially the public. It ensures that stakeholders are informed and that their feedback is considered in decision-making processes.

Policy and Compliance: The ESC ensures that projects or subcommittees adhere to all relevant laws, regulations, and internal policies.

Change Management: The ESC guides change management processes, ensuring that changes are smoothly integrated into the organization and that all team members are aligned and working together.

Continuity Planning: The ESC plans for continuity and the future sustainability of projects or subcommittees, including long-term planning to handle key member transitions without disrupting ongoing goals and objectives.

Primary Actions

In addition to providing clear direction and support, the AC's ESC is responsible for providing input into the development of meeting agendas, as well as plan review, and assessment of potential gaps that should be addressed.

Meaningful and Impactful Agenda Creation: AC meeting agendas should include relevant and engaging topics to maximize interest and ensure that meetings are focused on information sharing and collaboration.

Sample AC Meeting Agendas are included in Appendix C. At a minimum, meetings should include the following agenda items, as appropriate:

- Introductions
- Purpose (outlining the scope and responsibilities of the AC and meeting focus)
- FOSC/SOSC(s) Opening Comments
- AC Updates (plan revision updates and other key items)
- Subcommittee Brief-Outs
- Major Cases
- Open Forum (providing a venue for input on AC related activities)
- FOSC/SOSC(s) Closing Comments
- Announcement of Upcoming Key Events/Exercises, Next Meeting Date/Location, and Adjournment.

Plan Review and Approval Process Oversight: The ESC must stay informed about plan review requirements to include annual updates and the coastal ACP 5-year review schedule; see Chapters 2 (Baseline Plan Review & Analysis), 4 (Coastal ACP Management), and 6 (Plan Validation) for more information. The ESC shall ensure that draft ACP elements are widely distributed for review and feedback, setting reasonable deadlines for comments (e.g., 30 days). When the AC, through agreement from the ACP Administration Subcommittee, decides that the ACP is complete, the AC Manager will forward it to the ESC for final review. Only after the FOSC and SOSC(s) have reviewed and support the plan should the ACP be submitted to the USCG District staff for approval by the District Commander.

E. Area Committee Roles and Responsibilities

Under the NCP, the responsibilities of the ACs are defined primarily regarding planning and preparedness for oil and hazardous substance spills. Some of these key responsibilities include:

Development of ACPs: ACs are responsible for developing ACPs. These plans are meant to coordinate the actions of responding entities to remove a WCD and to mitigate or prevent a substantial threat of such a discharge.

Coordination Among Responders: ACs must ensure effective coordination among the various federal, tribal, state, and local responders. This includes integrating the capabilities of government entities and private organizations to effectively respond to incidents.

Resource Allocation: ACs assess the availability of equipment, personnel, and other resources necessary for responding to spills. They are responsible for ensuring that these resources are available when needed.

Training and Preparedness: Committees are tasked with organizing drills and exercises that test the ACPs and improve the readiness of various agencies and organizations in responding to spills. As a best practice, ACs should consider incorporating interagency training lists into AC meeting agendas and creating a calendar to promote training events. AC Managers and/or Training and Exercise Subcommittees are encouraged to coordinate with federal, tribal, state, and local emergency management agencies, as well as with environmental protection agencies and resource trustees, to compile the most comprehensive list of training events possible.

The AC may also develop and sponsor training activities related to the NRS, to enhance the ability of responders to access and effectively use the ACP. These training activities might be specifically tailored to the ACP or could cover broader topics such as NIMS Incident Command System (ICS) courses, health and safety training, or spill response courses. For ACPs that are electronic or web-based, the AC should also consider training on any necessary software needed to access and utilize these plans.

Public Information and Community Involvement: The AC is also responsible for ensuring that the public and local communities are informed about spill response strategies and that there is an opportunity for community input in the contingency planning process.

Regular Reviews and Updates*:* ACs review and update their ACPs regularly to incorporate new technologies, strategies, and LL from recent incidents to improve response capabilities.

F. Area Committee Communication Tools

This section outlines key internal and external communication tools that facilitate greater engagement within ACs. Many of these tools are commercially available, cloud-based IT solutions that fall into three primary categories: email marketing services, virtual collaboration platforms, and hybrid/virtual meeting software. To maximize participation and attract a new generation of stakeholders, ACs must integrate a combination of these tools, ensuring communication is efficient, accessible, and adaptable to evolving needs.

Virtual Collaboration Platforms

Virtual collaboration software, such as Microsoft Teams and Google Workspace, enhances document sharing and real-time editing, enabling multiple users to contribute simultaneously. These tools streamline the drafting of response plans, meeting minutes, and policy documents while maintaining version control, making it easier for agencies and industry partners to collaborate regardless of location. The USCG's ability to support this kind of virtual collaboration is difficult given cybersecurity requirements, so planners may have to lean on state organizations to support website updates and other virtual collaboration tools.

Hybrid and virtual meeting platforms, including Microsoft Teams and Zoom, allow for real-time discussions, presentations, and decision-making in both virtual and hybrid settings. These tools support video conferencing, screen sharing, and recording capabilities, ensuring that both in-

person and remote participants can contribute meaningfully to AC meetings. However, successful hybrid/virtual meetings can require significant IT support, adding to meeting logistical complexity. Best practices include using facilities that have integrated IT support and assigning personnel to ensure a successful hybrid/virtual meeting. Innovative solutions may be required to find and utilize the resources necessary for these types of meetings.

Modernizing Email Communications Management

AC meetings often suffer from poor advertisement and limited engagement due to outdated communication methods like non-HTML (text-only) emails, outdated email lists, and emails with attachments. These methods limit participation to a few key industry members and partner agencies, creating an 'echo chamber' that excludes broader tribal, state, and local participation. To combat this, some ACs have adopted Constant Contact for email list management, which may greatly improve the notification process for meetings.

USCG units and/or their partners should adopt a cloud-based email management tool. This is essential in modernizing external communications that enhance and broaden participation within the AC and keep members informed. Additionally, email campaign management tools like Mailchimp, Constant Contact, and others offer a wide range of analytics that can help AC personnel understand the performance of their email campaigns. Here are some of the key email-based analytics:

Open Rate evaluates how subject lines and sender names encourage recipients to open emails, and *Click-Through Rate (CTR)* assesses the impact of email content in driving traffic. The *Click-to-Open Rate (CTOR)* further gauges the engagement level of opened emails. Metrics like *Conversion Rate* track desired actions such as purchases or sign-ups, while *Bounce Rate* distinguishes between issues like invalid addresses (hard bounces) or temporary delivery problems (soft bounces). *Unsubscribe Rate* and *Spam Complaint Rate* reflect audience satisfaction and content relevance.

Advanced analytics provide deeper insights, including *Engagement Over Time* to optimize message delivery schedules, *Geographical Data* for regional targeting, and *Device and Platform Data* to refine email design. Tools like *Email Heatmaps* and *Engagement by Segment* highlight interaction patterns and audience-specific responses. Metrics like *List Growth Rate* and *Churn Rate* measure email list vitality, while composite indicators like *Email Engagement Score* offer a high-level view of overall performance. Together, these analytics enable data-driven strategies for maximizing email engagement.

Email analytics tools can help the AC more efficiently manage hundreds or even thousands of emails, fine-tune for specific subcommittees or workgroups, improve engagement, and drive better results. By regularly reviewing and acting on these insights, AC personnel can significantly enhance the effectiveness of their external communication efforts.

See Section H: Basic External Communications Strategy to Attract Attendees to a Public Meeting, for more information on a comprehensive communications strategy for public meetings.

Enhancing the Area Committee Meeting Engagement

AC meetings should provide an open forum for public attendance, allowing the public to provide real-time feedback to the AC. AC information and generated work products shall be documented and made available to the public. Enhancing the participant engagement will result in more effective meeting outcomes.

Ensuring a well-prepared and positive public meeting experience is essential for government officials because it builds trust, transparency, and engagement with the community. AC meetings and activities often involve multiple stakeholders such as concerned citizens, industry representatives, advocacy groups, and interagency partners. A well-structured meeting demonstrates competence, accountability, and responsiveness, reinforcing the government's commitment to serving the public interest. Below are several recommendations for holding a successful AC meeting.

Area planners should establish a baseline "Run of Show" for every AC meeting. This is a detailed, step-by-step agenda that outlines the flow and timing of the meeting, ensuring smooth execution and coordination among participants. It serves as an operational blueprint for event organizers, presenters, and hybrid/virtual meeting managers, helping to manage transitions, key messaging, and engagement with stakeholders. A well-prepared "Run of Show" ensures efficient time management and clear communication, making the meeting more productive and impactful for government agencies, industry partners, and the public.

A keynote speaker is an excellent choice for opening a day or weeklong meeting or conference because they set the tone for the entire event, inspire and energize the audience, and establish the overarching theme or purpose. A compelling keynote presentation can capture attendees' attention, provide thought-provoking insights, and align the audience with the meeting's objectives. Additionally, a well-chosen keynote speaker, especially one with expertise or influence in the relevant field, can enhance the event's credibility and draw greater interest and participation.

Another common pitfall for AC meetings and their agendas is "death by PowerPoint." Creating a compelling PowerPoint presentation involves several key methods:

- Clarity and Simplicity: Keep slides clean with minimal text, using bullet points to highlight key ideas. Slides should supplement what the presenter is saying without repeating it verbatim. Use slides to reinforce, supplement, and provide a way for the information to be remembered.
- Visuals and Graphics: Use images, charts, and infographics to support and illustrate your points.

- Consistent Design: Maintain a consistent color scheme, font style, and slide layout to ensure a cohesive look.
- Varied Content: Include a mix of media, such as videos or animations, to keep the audience engaged.
- Practice and Timing: Rehearse your presentation to ensure smooth delivery and proper pacing.

These methods help create a visually appealing, informative, and engaging PowerPoint presentation that effectively communicates your message.

In addition, a variety of interactive tools are available to encourage more meaningful participation in your meetings:

- Polls and Surveys: Tools like Mentimeter, Slides with Friends, Aha Slides, or Poll Everywhere allow you to ask real-time questions and gather instant feedback from participants.
- Live Q&A Sessions: Zoom's Q&A feature enables attendees to submit questions, which can be upvoted by others, ensuring that the most pressing issues are addressed.
- Interactive Whiteboards: Tools like Miro or Microsoft Whiteboard allow participants to brainstorm, map out ideas, and collaborate visually.
- Breakout Rooms: In platforms like Zoom or Microsoft Teams, you can divide participants into smaller groups for focused discussions, increasing engagement and allowing more voices to be heard.
- Collaborative Documents: Use Google Docs or Microsoft OneNote for real-time collaborative notetaking or document editing, so everyone can contribute ideas and content.
- Gamification: Introduce quizzes, challenges, or rewards using tools like Kahoot! to make the meeting more engaging and fun.

By integrating these interactive tools, you can create a more dynamic and inclusive AC meeting environment that encourages active participation and meaningful contributions.

Addressing Cybersecurity Concerns

Email marketing tools like MailChimp and Constant Contact are designed with security and compliance features that make them viable options for the USCG to use without cybersecurity concerns. These platforms operate as cloud-based, commercially available Software-as-a-Service solutions with built-in protections that align with modern cybersecurity best practices. Below are some notable security features of email marketing tools:

Platforms like MailChimp and Constant Contact incorporate several security features, such as end-to-end encryption for both data in transit and at rest, to ensure that sensitive information remains

protected from unauthorized access. Additionally, multi-factor authentication (MFA) enhances security by requiring multiple verification steps before granting access, reducing the risk of compromised accounts.

Compliance with industry security standards ensures that these platforms adhere to strict data protection protocols. To prevent phishing and spoofing attacks, these tools implement email authentication protocols. These measures ensure that only verified senders can distribute official USCG communications, minimizing the risk of misinformation or malicious activity.

Additionally, these cloud-based services include continuous security monitoring, which automatically detects and blocks suspicious activities such as unauthorized login attempts, bot-driven attacks, and large-scale email fraud attempts. Regular automated security patches and software updates further protect against evolving cyber threats. By using dedicated workspaces with restricted permissions and pre-approved content controls, these platforms can be securely integrated into USCG communication strategies while maintaining compliance with federal cybersecurity guidelines.

The email platforms described above provide a secure, compliant, and controlled method for the USCG to distribute information to stakeholders without violating cybersecurity policies. Their robust encryption, authentication, compliance standards, and phishing protections make them safe for use in official communications, provided they are integrated within approved cybersecurity guidelines and restricted to unclassified, public-facing messaging.

G. Knowledge Management and Documentation

An important early AC decision is to determine the appropriate level of record-keeping and documentation, and the amount of administrative support required to maintain this level. Administrative support may be provided by staff from participating agencies or from their support contractors and includes the maintenance of files, distribution lists, web sites, and other tasks.

Each AC should create, manage, store and retain decisional documentation within the relevant USCG system of record, and the documentation may be replicated or cross posted/linked on a state or other federal agency system. The recommended actions below are the minimum AC personnel should take to ensure appropriate knowledge management, records of decision and related document retention.

Documentation, Record-keeping and Administrative Support

Record-keeping is essential for effectively managing the AC, providing a structured and reliable system for capturing, maintaining, and retrieving critical information. Well-organized records enhance transparency and accountability, fostering trust within and outside the AC. They support tracking progress, evaluating performance, making informed decisions, and maintaining historical documentation for reference, analysis, or potential legal proceedings. Additionally, proper record-keeping plays a crucial role in dispute resolution, audit compliance, and ensuring operational

continuity during personnel transitions or crises. By safeguarding intellectual property and protecting sensitive information, a strong records management system ensures that critical data remains accessible, secure, and intact when needed.

A comprehensive review of records retention policies found no National Archives and Records Administration (NARA) requirements specific to AC work. Likewise, there are no internal USCG records retention requirements explicitly covering an approved ACP. Despite the absence of formal federal or agency-specific guidance, best management practices include retaining documents that establish a record of decision. This practice is essential for fostering trust in interagency collaboration and maintaining transparency and accountability with the public. Keeping a complete record of an AC's work to include subcommittees, workgroups, and ESC activities ensures clarity in decision-making and outstanding actions and preserves institutional knowledge.

The following guidance outlines potential actions for document retention to establish a record of decision effectively.

Actions to Document Decisions

- **Designate a Note-Taker:** Assign a dedicated individual (e.g., a committee secretary or a designated note-taker) to document the meeting. This person should focus on capturing decisions, key discussions, and action items. Before the meeting adjourns, review key decisions and action items and ask AC members if anything is missing.
- **Create a Structured Agenda:** Before the meeting, distribute an agenda with clear objectives or expected outcomes and topics for discussion. This will help ensure that decisions are documented under specific agenda items.
- **Record Attendance:** Document who is present at the meeting, including any external participants or observers. If there are remote participants, capture those that called in or individuals that are co-located under one username.
- **Capture Key Decisions:** Record decisions as they are made, noting the context, any options considered, and the final resolution. Include details such as who proposed the decision, who seconded it (if applicable), and whether it was unanimous or passed with dissent (if there was a vote).
- **Document Action Items:** Clearly outline any action items resulting from the meeting, including who is responsible for each task and the deadline for completion. Consider maintaining an action item tracker that includes a status to mark as complete, in progress, or outstanding for past and current items.
- **Use Decision Logs:** Maintain a decision log or register that includes all decisions made by the committee. This log should be a living document, updated after each meeting.
- **Summarize Discussions:** While not every detail of the discussion needs to be recorded, summarizing the key points that led to a decision can be valuable for future reference.

- **Approve Minutes:** After the meeting, circulate the draft minutes to all committee members for review and approval. Once approved, the minutes become the official record.
- **Ensure Confidentiality:** Mark sensitive information as confidential and ensure that it is handled according to your organization's confidentiality policies.

Document Retention Recommendations

By following the guidelines below, you can effectively document decisions and manage the retention of important documents within your AC organization.

Retention Periods:

- Minutes of Meetings: Typically, minutes should be retained permanently or at least for the life of the organization, as they are key legal and historical documents.
- Decision Logs: Retain decision logs permanently, especially if they relate to long-term projects or strategic decisions.
- Supporting Documents: Retain any supporting documents (e.g., reports, presentations) for at least 7-10 years, depending on legal requirements and organizational policy.

Electronic Storage:

- Electronic Documents: Store documents in a secure, centralized digital repository with regular backups. Consider establishing a shared drive for document storage. Ensure that access controls are in place to protect sensitive information. Approved and signed ACPs should be disseminated among stakeholders. All other work product documents may be stored within Microsoft 365 in some manner agreed upon by relevant AC personnel.

Compliance with Legal Requirements:

- As stated previously, there are currently no federal records retention requirements that apply specifically to an approved ACP. Coordinate with your state agencies to determine if there are state-level retention requirements that may apply to AC documents.

Regular Review and Disposal Recommendations:

- Review: Periodically review retained documents to ensure they are still relevant and necessary.
- Disposal: Implement a secure disposal process for documents that are no longer needed, ensuring that confidential information is destroyed appropriately (e.g., shredding physical documents, securely deleting electronic files).

Policy Documentation:

- Clearly document the AC's document retention policies and ensure that all members of the ESC are aware of them.

H. External Communications Strategy to Improve Public Engagement

To improve public engagement, early and broad dissemination of meeting notices is essential. Working with other AC members to publicize meetings and events, and leveraging communications software, can effectively manage distribution lists. Meetings should be open to the public, avoiding military bases which may discourage participation due to access issues.

Implementing the following external communications strategies will help ensure that your public meeting is well-attended and successful in achieving its objectives.

Define the Meeting Objectives and Target Audience

- Clearly outline the purpose and objectives or expected outcomes of the meeting. Identify the target audience, including community members, local businesses, NGOs, tribal representatives, government officials, and other stakeholders.

Develop Key Messages

- Create clear, concise, and compelling messages that explain the purpose of the meeting, what attendees can expect to learn and contribute, and how their participation will impact the community or project. All externally facing communication, including posts on social media accounts or other press releases, must be coordinated with the applicable district's Public Affairs Office and the applicable state agency's Public Information Officer.

Utilize Multiple Communication Channels

- Email Campaigns: Ensure use of professional emails/calendar invites. May also use tools like Constant Contact to manage hundreds or thousands of emails, and to create visually appealing and informative email invitations (this is a subscription-based program). Segment your email list to ensure messages reach the most relevant audiences (e.g., ESC, subcommittees, general AC membership).
- Social Media: Promote the meeting across various social media platforms (Facebook, LinkedIn, Instagram). Create event pages, share regular updates, and engage with followers to generate interest.
- Press Releases: Distribute press releases to local newspapers, radio stations, and TV channels. Highlight the significance of the meeting and encourage media coverage.
- Flyers and Posters: Design eye-catching flyers and posters to distribute in high-traffic areas such as community centers, libraries, local businesses, and schools.
- Community Newsletters: Partner with local organizations to include meeting announcements in their newsletters.

- Website and Blog: Post meeting details on your organization's website and write blog posts about the meeting's topics and significance.

Partner with Local Organizations

- Collaborate with local NGOs, community groups, and businesses to help promote the meeting. These organizations spread the word through their networks and endorse the importance of attending.

Personal Invitations

- Send personalized invitations to key stakeholders and community leaders. Personal touches, such as phone calls or hand-delivered invitations, can significantly boost attendance.

Engage with Local Media

- Schedule interviews with local media outlets to discuss the meeting's purpose and encourage public participation. Utilize community radio shows, podcasts, and local news programs.

Leverage Word of Mouth

- Encourage team members, volunteers, and supporters to spread the word about the meeting. Word of mouth is a powerful tool, especially in tight-knit communities.

Provide Clear Meeting Details

- Ensure all communications include essential details such as date, time, location, agenda, and how to RSVP. Include information on remote attendance options if available.

Follow-Up Reminders

- Send follow-up reminders a week before and the day before the meeting. Use email, social media, and text messages to ensure maximum attendance.

Create an Engaging Event Experience

- Plan an engaging and interactive meeting to encourage attendees to participate actively. Include opportunities for questions, feedback, and networking.

Evaluate and Adjust

- After the meeting, evaluate the effectiveness of your communication strategy. Gather feedback from attendees on how they heard about the meeting and what motivated them to attend. Use this information to improve future outreach efforts.

Chapter 4: Coastal ACP Management

A. Best Management Practices for Plan Management

Signing the Approved ACP

While the ACP approval authority is at the USCG District level, it is also a community plan and, in some cases, states may choose to adopt ACPs as their oil spill and/or hazardous substances contingency plan. Because of this, it is highly recommended that the relevant state agencies be included in the AC review process leading up to submission for District Commander approval and in the promulgation of the plan once approved.

ACP Publishing and Distribution

Once ACPs are approved/promulgated and/or updated annually, the AC should publish them, using multiple web locations to ensure maximum stakeholder access. Effective sites for ACP distribution include:

- State agency websites (e.g., OSPR - Contingency and Response Plans (ca.gov), Texas General Land Office (Texas.gov))
- RRT websites (e.g., Regional Response Team Northwest Area Committee (rrt10nwac.com), RRT3 Regional Contingency Plan, Inland, and Coastal Area Contingency Plans)
- EPA Regional websites (e.g., Region 5 Regional Contingency Plan/Inland Zone Area Contingency Plan (rrt5.org))
- A Standalone, ADA-compliant HTML website.

ACP Evaluation

Once the ACP is distributed, the AC should develop ways to evaluate its effectiveness. The ACP itself should contain contact information for receiving feedback and the AC should consider comments received for possible future amendments. Another important element of evaluating an ACP is an environmental tradeoff analysis. This is the process by which response actions are evaluated for effectiveness along with the potential negative impacts of these operations. More information on environmental tradeoff analysis is located in Appendix K.

Under 40 CFR § 300.212, the FOSC is to periodically conduct drills of removal capability (including fish and wildlife response capability), without prior notice, in areas for which ACPs are required by § 300.210(c) and under relevant tank vessel and facility response plans. The AC should encourage its members to use the ACP when conducting drills and exercises in internal agency venues and in interagency exercises. The AC should ensure that exercise evaluations relating to the ACP are documented and LL are included in the ACP review process.

In evaluating the ACP, the AC must consider findings from the FOSC AARs of significant incidents and exercises. ACs should consider holding annual after-action meetings (sometimes called the Training and Exercise Planning Workshop (TEPW), where all relevant agencies and industries meet to discuss LL and agree on how to incorporate them into the next update to the ACP.

ACP Modifications

Technological advances, jurisdictional and organizational changes, infrastructure changes, and other factors may lead to a need to modify the ACP. The USCG has established the update and review cycle for the ACP in Emergency Management Manual Volume I: Emergency Management Planning Policy (COMDTINST M3010.11 (series)) as being an FOSC annual update and a formal 5-year revision subject to review by the CGNRP.

- *Annual Updates:* The annual update requirement ensures that perishable information critical to notifications and response is up-to-date. This includes, but is not limited to, validation of points of contact, contact information, and hyperlinks and references.
- *Formal Revision:* The 5-year formal revision process is focused on addressing the critical precepts established by the CGNRP. The NRP evaluates all coastal ACPs on a 5-year schedule to ensure consistency and compliance with established precepts.

It is also important to establish a method for providing interim updates for significant events that cannot wait for the regular update cycle. This could include, for instance, the discovery of new WCD scenarios from vessel response plans and FRPs that exceed those in the current ACP. The AC should not feel restricted to conducting major revisions only every five years. Instead, it should develop a plan for regular updates to key policies and guidelines throughout the five-year period. This approach requires diligent version control and date-stamping of the ACP, ensuring that all users have access to the most up-to-date information.

At a minimum, the AC should regularly update their respective RRT(s) on progress through high-level presentations and updates at RRT meetings. Furthermore, the AC should strategize the dissemination of information within the AC community. The Committee may function as a central hub for distributing news, policies, and best practices related to planning and response. AC members are responsible for ensuring their respective agencies are informed about the ACP, including how to access and utilize it, so that all responders are equally prepared for incidents. Additionally, the AC should be ready to fulfill information requests from external entities and organizations. This may involve creating fact sheets and briefing materials that offer a concise overview of the ACP.

B. Area Committee Role in ACP Management

Active participation of AC members in updates, revisions, and validation of the ACP is crucial for several reasons:

- **Relevance and Accuracy:** Committee members bring local expertise and knowledge, ensuring that the ACP reflects the current conditions, risks, and resources specific to the area. This helps in maintaining the plan's accuracy and relevance.
- **Effective Response:** By engaging in regular updates, members help ensure that the plan is comprehensive and up-to-date, which is vital for an effective and coordinated response during emergencies. This includes identifying potential gaps and addressing them proactively.
- **Coordination and Collaboration:** Active participation fosters better communication and coordination among different stakeholders. This collaborative approach improves the efficiency of response efforts and enhances overall preparedness.
- **Training and Familiarity:** Regular involvement in the planning process helps members become more familiar with the plan's procedures and their roles within it. This preparedness translates into more effective execution during actual incidents.
- **Resource Management:** Members help identify and manage local resources and capabilities. Their input helps ensure that the plan incorporates the most current information on available assets and support systems.
- **Regulatory Compliance:** Participation helps ensure that the ACP meets legal and regulatory requirements, which can be essential for funding, liability protection, and maintaining official support.

Active involvement by AC members at the federal, tribal, state, and local levels is key to maintaining a robust, actionable, and locally tailored ACP, ultimately enhancing community safety and resilience in the face of emergencies. This may also be accomplished via effective use of subcommittees (e.g., ACP Management, Training and Exercises).

Chapter 5: ACP Scope, Format, & Content

A. ACP Architecture

In October 2023, the USCG introduced a new ACP architecture for the coastal zones of the United States and its territories. This update marked the first significant overhaul of the ACP framework in over 25 years and was the result of extensive collaboration, including internal and external feedback, focus groups, a national survey, and field testing. The draft architecture was available for public comment via the Federal Register from December 2022 to January 2023. Feedback was reviewed and adjudicated by a panel of subject matter experts, and the final version incorporated these revisions. The final coastal ACP architecture can be found in Appendix E.

The goal of modernizing the coastal ACPs is to enhance usability and operational effectiveness while achieving national consistency in the ever-evolving risk environment of the Maritime Transportation System (MTS). This new standardized framework aims to help industry plan writers, who manage vessel and facility response plans across various operating areas, align more consistently with USCG-approved ACPs. Consistent alignment between industry response plans and ACPs is a key component of the NRS.

The standardized approach is designed to reduce confusion caused by variable ACP structures and content, leading to more efficient responses, particularly in large-scale incidents requiring resources from outside the local area. Additionally, this consistent framework will support the development of a modern, mobile-based ACP tool for field responders. The transition to this new architecture is expected to be complete by October 2026. While the new architecture provides a macro-level structure, the USCG acknowledges that some local variability will remain.

B. ACP Formatting

See Appendix F for guidance in formatting ACPs.

C. Required Documentation

All ACPs are required to include the following documentation, placed within the plan's first few pages:

- Approval letter signed by the District Commander
- Letter of promulgation signed by the FOSC (AC Chair)
- Record of change page.

D. Part 1000: General & Administrative

1100 Introduction

This part should be comprised of a brief introduction to the ACP (i.e., authority, scope, document organization, etc.). It should also link to CFR sites as applicable and other supplemental information as necessary.

1200 Purpose of the ACP

Clearly state the purpose of the ACP as a reference document that outlines how various agencies within a specific geographic area will coordinate and respond to environmental emergencies, like oil spills or hazardous substance releases, by providing critical local information and promoting interagency collaboration to ensure an effective response; essentially acting as a blueprint for coordinated action in case of an incident.

1210 List/Table of Annexes

Include an introduction to both the standard and non-standard annexes contained within the ACP to include a brief description or scope of each annex. This should include a list of the annexes along with links—incorporation of this information into a table format makes this easy to use and update.

1300 Area Committee Management & Administration

This part should include information on each AC Charter (or link to the Charter). Additionally, it should discuss AC meeting management and frequency, and subcommittee info; identify members and members at large; discuss the ESC, as applicable; and review any additional information that may be relevant (e.g., remote meeting capabilities, FOSC Annual Report, etc.). More information related to AC management and administration, including best practices and resources, can be found in Chapters 3 and 4 of this handbook.

1310 Area Committee Organization

The AC structure should be outlined to include member agencies, the ESC (if present), as well as any standing subcommittees, workgroups, or task forces. More information on AC Organization can be found in Chapter 3.C. of this handbook.

1320 Charter

Each AC, steering committee, and any standing subcommittees should have charters which outline membership, objectives, deadlines, and other expectations. More information on charters can be found in Chapter 3.F. of this handbook and an example charter can be found in Appendix D.

1330 AC Meetings

Clearly identify the purpose, frequency, and process for advertising and holding AC meetings. Information on meeting management can be found in Chapter 3.F. of this handbook.

1400 ACP Validation and Testing

This section should clearly outline requirements and procedures for the annual ACP update process, 5-year review cycle (e.g., CGNRP overview), and ACP approval by the District Commander; and offer a brief overview of GRS/GRP Validation (link to an Area or Regional Annex for a more detailed validation process as necessary). It should also include PREP Area exercise cycle information and incorporation of LL.

1410 ACP Update, Review, and Approval Process

Outline the process for ACP review and approval to include timelines for review and incorporation of any state requirements and processes. More information on ACP update, review, and approval can be found in Chapter 4 and 6 of this handbook.

1420 GRS Validation (i.e., booming and collection strategies)

Currently there is very limited practical guidance on how to perform Geographic Response Strategies (GRS) validations. Current policy on GRS validation is located in Chapter 6 of this document and the MERPMAN. CG-MER is establishing a GRS Task Force under the Coastal ACP Workgroup to identify the different existing products and policies regarding development of GRS and GRS validation.

1430 Area Exercises

Describe how area exercises are planned and executed. At a minimum, this section should reference the MERPMAN, Emergency Management Manual: Volume III, PREP Guidelines, as well as any other federal or state requirements.

1500 ACP Relationship/Alignment with other plans under the National Response System

This section should identify the relationship of the ACP and other federal, tribal, state, local, and industry contingency plans. If available, this section should include links to CFR citations, international plans, and graphics as necessary. Figure 3 (40 CFR 300.210) on the following page provides describes the relationship between the variety of NRS plans and planning groups.

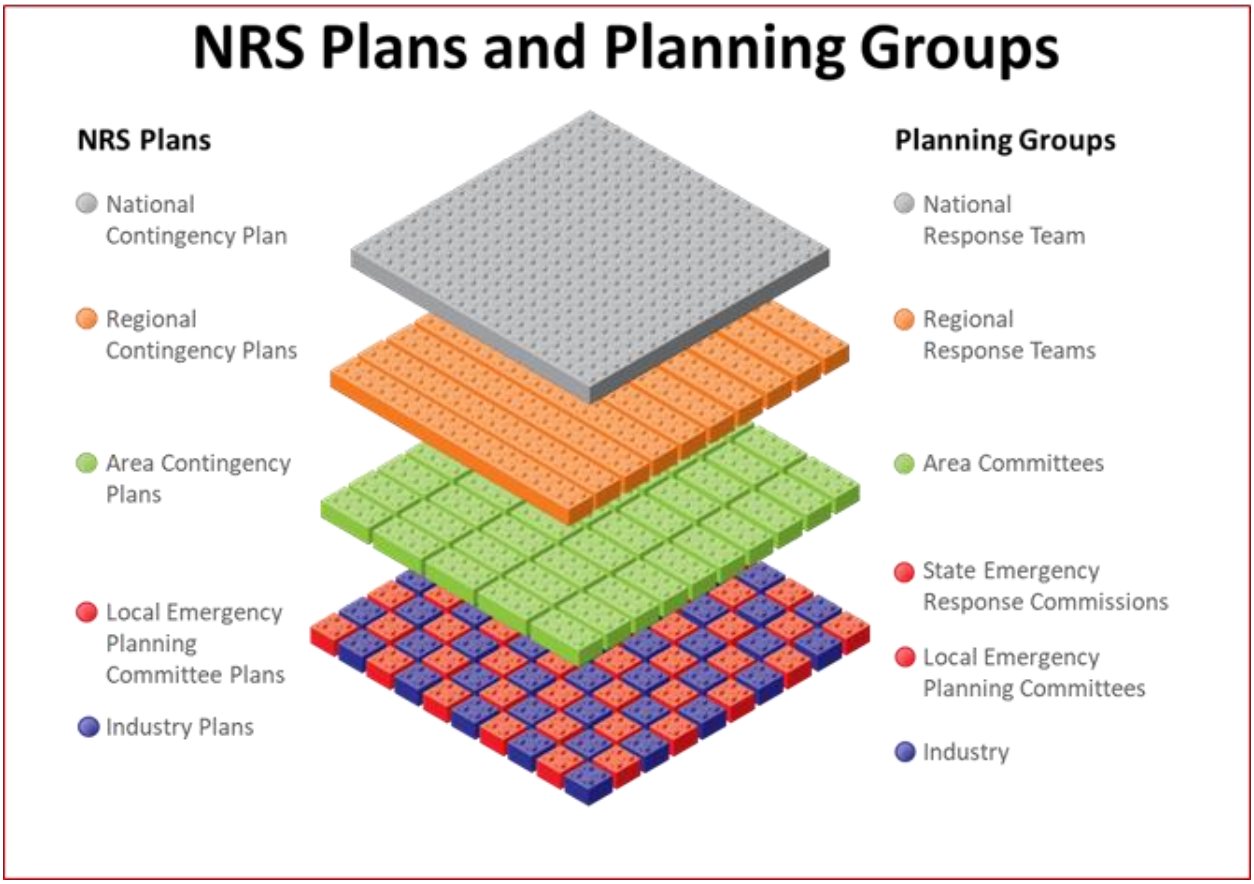


Figure 3: NRS and Planning Groups

1510 Vessel Response Plans

Vessel Response Plans (VRPs) are approved and managed by CG-MER-4. This section should identify the purpose of VRPs to include activation and deviation.

1520 Facility Response Plans

Maritime Transportation System (MTS) regulated facility FRPs are approved and managed by the local USCG Sector or Marine Safety Unit (MSU). Non-MTS regulated facilities are subject to oversight by various other government agencies (e.g., EPA, Department of Transportation (DOT), the Bureau of Safety and Environmental Enforcement (BSSE), National Response Center). This section should identify the purpose of FRPs, as well as plan activation and contact information for plan requests.

1530 Local Plans

Some areas, especially those with active LEPCs, may have local plans for oil or hazardous substance response. This section should identify any existing plans as well as the staff responsible for management of these plans.

1540 State Plans

Each state has its own unique planning requirements and processes. In some cases, the states have adopted the ACP as their oil spill or hazardous substance response plan. This section should identify how the ACP relates to state planning requirements and any additional plans that support the ACP.

1550 Tribal Plans

Some areas have well developed tribal response plans. This section should include links to these plans and identify which federally recognized tribe maintains them.

1560 Regional Contingency Plan

This section should explain the relationship between the ACP and RCP(s) and contain a link to the relevant RCP(s). Note that there may be more than one RCP that overlaps with an ACP, so it will be important to note any significant differences across regional boundaries.

1570 International Plans

Joint Contingency Plans and other international oil spill plans are owned and maintained by CG-MER-2. This section should identify international plans in the area as well as links to the MER-2 external site with the relevant international plans.

1600 ACP Relationship to the National Response Framework (NRF)

The ACP is considered an operational supplement to the NRF. The NRF is a plan that helps the United States prevent, prepare for, respond to, and recover from emergencies, including terrorist attacks and major disasters. The ACP, meanwhile, describes the role and responsibilities of a specific organization during an oil spill or hazardous substance release.

The United States uses the NRF to coordinate the Federal Government's response to disaster or emergency situations. The NRF is applicable to natural disasters involving earthquakes, hurricanes, typhoons, tornadoes, volcanic eruptions, floods, and fires; technological emergencies involving radiological or hazardous materials; and other incidents requiring federal assistance under the Stafford Act. The NRF describes the basic mechanisms and structures by which the Federal Government mobilizes resources and conducts activities to augment state and local response efforts. To facilitate the provision of federal assistance, the NRF uses a functional approach to group the types of assistance that a state is most likely to need among 15 Emergency Support Functions (ESFs).

1700 ACP Relationship to the National Incident Management System (NIMS)

The ACP should include a brief section that commits the AC to NIMS compliance and references the Incident Management Handbooks and Field Operating Guides that are used by participating agencies.

1800 ACP Relationship to other Marine Transportation System (MTS) Focused Response Plans Managed by the Coast Guard

There may also be other USCG-managed plans which are related to the ACP or influence response or preparedness activities. It is critical that the ACP work in concert with and support these other response plans to more wholistically safeguard and protect the MTS. This section should identify such plans and explain how they relate to the ACP. This may include an overview of the Area Maritime Security Plan, Marine Transportation System Recovery plan, Vessel Security Plan, Facility Security Plan, Salvage Response Plans, and more. The USCG must ensure operations conducted under each plan are synchronized for a more effective multi-mission response.

E. Part 2000: Geographic Scope & Jurisdictional Boundaries

This part defines the geographic and jurisdictional boundaries covered by the coastal ACP. Use of maps/graphics will make depiction of these areas easy for users and should include descriptions of the area covered in simple language best described/depicted by local/area responders, links to Captain of the Port (COTP) Zone CFR citations, EPA/USCG memorandum of understanding (MOU) hyperlinks, etc. See the descriptions below for an overview of this part.

2100 Description of Coast Guard Coastal Zone / EPA Inland Zone Boundary (Line of Demarcation)

The jurisdictional boundaries of coastal ACPs are limited to the coastal zone area for which the USCG has federal responsibility for response action. Coastal zones as defined for the purpose of the NCP means all United States waters subject to the tide, United States waters of the Great Lakes, specified ports and harbors on inland rivers, waters of the contiguous zone, other waters of the high seas subject to the NCP, and the land surface or land substrata, ground waters, and ambient air proximal to those waters. This is the area covered by each coastal ACP.

EPA has federal responsibility for response actions in the inland zone, which are covered by the respective inland ACPs. “Inland zone” means the environment inland of the coastal zone excluding the Great Lakes and specified ports and harbors on inland rivers; the term delineates an area of federal responsibility for response action.

2200 USCG / EPA MOU

The Code of Federal Regulations (CFR) Title 40 Part 300 (40 CFR § 300.210) requires that RCPs contain lines of demarcation between the inland and coastal zones, as mutually agreed upon by USCG and EPA. Precise boundaries are determined by EPA/USCG agreements and can be found within the RCPs, which are managed by their respective RRTs.

2300 Geographic Boundaries / Coordinates

The USCG COTP shall serve as the designated FOSC for areas in the coastal zone. The geographic boundaries for each of the USCG COTP Zones can be found in 33 CFR § 3.05-3.85.

2400 Graphic(s) Depicting Geographic Area Covered by ACP

This part of the ACP should include figures, tables, and links to applicable information to clearly show the area covered by the plan. Geographic area maps depicting the coastal/inland zone jurisdictional boundaries and USCG COTP Zones may be found on the Environmental Response Management Application (ERMA). An interagency agreement between the USCG and NOAA (MOA-02017-128/10500), signed in September 2018, designates the online mapping tool ERMA as the Common Operating Picture (COP) for USCG-led trainings, exercises, and responses to discharges of oil and releases of hazardous substances, pollutants, and contaminants as mandated by the NCP, NRF, and authorizing legislation. These boundaries may be located as layers under 'Federal Agency Regions & Offices.'

2500 Sub-geographic Area Information

This part is intended to provide information related to counties, parishes, and/or territories in the areas covered by the coastal ACP and should also include figures, tables, and links to applicable information for sub-geographic areas and descriptions of subordinate units (e.g., Marine Safety Units) as applicable.

F. Part 3000: Roles & Responsibilities

3100 General Roles and Responsibilities

3110 Responsible Party/Industry Plan Holder

The responsible party/potential responsible party (RP/PRP) is responsible for responding to a discharge or potential discharge as outlined in the NCP. This section should identify those federal requirements as well as any corresponding state statues.

The RP/PRP is responsible to contain, control, and clean up any oil or hazardous substance spilled in accordance with the NCP and all applicable industry plans. The RP/PRP must notify the federal, tribal, state, and local authorities of the spill incident and initiate an effective response. The

RP/PRP is expected to respond to an incident using their own resources and securing additional contractual expertise and equipment when necessary.

The FOSC has the authority to oversee the RP/PRP's response activities and is authorized to take over or augment those activities if they are determined to be inadequate. During an RP/PRP-led response, if the regulated vessel or facility has a response plan under state law or a VRP or FRP under the national planning criteria, it will serve as the primary guidance document for the spill response, and the RP/PRP will designate the Incident Commander (IC).

3120 Local Government

This section should describe LEPC roles and responsibilities as applicable and explain how the State Emergency Response Commission (SERC) ties in as applicable.

Local governments with jurisdiction to direct and coordinate local responses to incidents designate Local On-Scene Coordinators (LOSCs) to serve and represent their communities. These individuals are physically present at the response, and if the incident requires, there may be multiple LOSCs within a single unified command. LOSCs are normally part of the Unified Command if there is an immediate threat to public safety and/or the incident occurs within their local jurisdiction.

In the event of an oil discharge or hazardous substance release which impacts or threatens to affect multiple jurisdictions, the appropriate officials from the affected communities will integrate into the command structure, either through an LOSC liaison representing the affected communities or through a multi-agency coordination group.

3130 State Government

State agency roles and responsibilities vary state-to-state, and many ACPs cover multiple states and/or territories. This part should outline the responsibilities of key state agencies, technical expertise, and specific duties and responsibilities of each. At a minimum, the following should be identified:

- SOSC for oil and for hazardous substances (if different)
- Agency responsible for State Historic Preservation Officer (SHPO) responsibilities
- State Emergency Management Agency (will be heavily involved in an ESF-10 response, reference ESF-10 Annex H)
- State Agency responsible for air, water, and sediment quality
- State Agency for public health
- Other state agencies as applicable.

This section should list the lead agency for each state included within the AC that is responsible for oil and hazardous substance response. It should also clearly identify which state agency will

serve as SOSC in the Unified Command (UC) and indicate state statutes which outline this authority.

In response to concerns for safety around chemical facilities, Congress enacted the Emergency Planning and Community Right-to-Know Act (EPCRA), also known as Title III of the Superfund Amendments and Reauthorization Act (SARA). EPCRA covers the manufacture, use, exposure, transportation, and public education of hazardous materials. The State Emergency Response Commission (SERC) is the leading entity in the implementation of SARA at the state level to mitigate the effects of an accidental release or spill of hazardous materials. The SERC establishes Local Emergency Planning Districts within each state and manages the state's LEPCs. The SERC also reviews the State Oil and Hazardous Substance Discharge Prevention and Contingency Plan and Local Emergency Response Plans.

Also indicate whether the state has a statute which directs the SERC to be an all-hazard organization. This important distinction clarifies the role of the state(s) to address hazardous materials issues and all other hazards and threats that might create an emergency situation in communities.

3140 Tribal Government

For spills which impact or may impact tribal lands or resources, the UC should consider establishing a Tribal On-Scene Coordinator (TOSC). The role of the TOSC is broad, but focused on two main areas:

- Ensuring that tribal needs, priorities, and concerns are reflected in the incident objectives and the decision-making of the UC.
- Offering tribal resources to support the response and making it more efficient and effective through tight coordination with the tribal community and government.

Federal law identifies the requirements for formal consultation and engagement. It is important for the UC to establish communications with potentially affected tribal communities early in a response. The Federal Government shall defer to tribes in determining whether a particular incident may impact tribal resources. More information on the role of TOSCs and tribal concerns is located in Annex M of this document.

3150 Regional Response Team

This portion should reference the RRT roles and responsibilities relating to oil and hazardous substance preparedness, response, and recovery. It may reference the applicable RCP and provide links to RRT websites and documents.

3200 Natural Resource Trustees

When oil spills or hazardous substance releases occur, federal, tribal, and state agencies typically conduct or participate in emergency response activities to minimize impacts. Natural Resource

Trustees play an important role in these response activities and should be integrated into the ICS as early in a response as possible. Natural Resource Trustees may include:

- State/local (e.g., Natural Resource or Wildlife Agencies, parks/refuges, agencies responsible for shellfish safety and/or fisheries management)
- Tribal (e.g., Bureau of Indian Affairs, federally recognized tribes)
- Federal (e.g., NOAA/NMFS, DOI/USFWS, National Park Service).

The role of the Natural Resource Trustee is broad. Following is a list of actions that trustees should coordinate to support response efforts:

- Conduct a preliminary survey of the area affected by the discharge or release to determine if trust resources under their jurisdiction are, or potentially may be, affected.
- Cooperate with the FOSC in coordinating assessments, investigations, and planning.
- Carry out damage assessments, or devise and carry out a plan for restoration, rehabilitation, replacement, or acquisition of equivalent natural resources. In assessing damages to natural resources, federal, state, and tribal trustees have the option of following the procedures for natural resource damage assessments located at 43 CFR part 11.
- Provide timely advice on recommended actions concerning trustee resources that are potentially affected by a discharge of oil or release of a hazardous substance. This may include providing assistance to the FOSC in identifying/recommending pre-approved response techniques and in predesignating shoreline types and areas in ACPs.

In addition to providing the UC with guidance about response tactics, Natural Resource Trustees also provide input to determine the endpoints of a response or "how clean is clean," which relates to when cleanup can be declared complete. As per 40 CFR § 300.320 (b), the final decision about how clean is clean is made by the FOSC and representative of the governor or governors of the affected states; those decisions should be based on recommendations made by scientists in the Environmental Unit in accordance with state regulations and in consultation with Natural Resource Trustees and representatives of stakeholders in the area.

The NCP further outlines Trustees for Natural Resources to include responsibilities in 40 CFR § 300.600-300.615.

3210 Local

Some areas may include local environmental agencies and/or environmental NGOs. This section should clearly identify the role of these agencies and how they support the FOSC for natural resource-related decisions.

3220 State

State trustees shall act on behalf of the public as trustees for natural resources, including their supporting ecosystems, within the boundary of a state or belonging to, managed by, controlled by, or appertaining to such state.

This section should identify the state natural resource trustee agency for any oil and hazardous substance response that requires input on potential impacts to state resources and list their roles and responsibilities. The appointed agency should designate a representative to serve as contact with the FOSC/UC. This individual should have ready access to appropriate state officials with environmental protection, emergency response, and natural resource responsibilities.

3230 Tribal

Tribal representatives play a key role in response considerations which impact natural resources. Representatives may include federally recognized tribes as well as tribal organizations. This section should identify which tribes would be involved as a natural resource trustee as well as the scope of their input and points of contact.

3240 Federal

The NCP identifies and designates Natural Resource Trustees for oil and hazardous substance response. These trustees can be found in 40 CFR § 300 Subpart G.

3240.1 Secretary of Commerce

Under the Secretary of Commerce, the National Oceanographic and Atmospheric Administration (NOAA) is the primary federal natural resource trustee for ocean and coastal resources, with different offices having different responsibilities. Under NOAA, the National Marine Fisheries Service (NNFS) is responsible for endangered and threatened marine species and habitats as well as commercial fisheries. NOAA's National Ocean Service (NOS) has responsibility for ensuring the restoration of coastal resources and the services provided by those resources that are diminished or lost as a result of injury by oil and hazardous substance releases. NOAA NOS also serves as the trustee for National Marine Sanctuaries and the National Estuarine Research Reserves. During a response, environmental response and restoration specialists from NMFS and/or NOS may collect data to help assess the effect of the spill or release and the response actions on wildlife, habitats.

More information on the legal context for NOAA as a Natural Resource Trustee is located at the following website: https://darrp.noaa.gov/legal-context.

3240.2 Secretary of the Interior

Under the Secretary of the Interior, USFWS is the primary federal natural resource trustee responsible for managing national wildlife refuges, endangered and threatened species, migratory birds, and other related land based and generally fresh water natural resources, including fish. During a response, environmental response and restoration specialists from USFWS collect data to help assess the effects of the spill or release and the response actions

on wildlife and other natural resources. The Secretary of DOI may also serve as trustee of natural resources for Indian Tribes.

3240.3 Secretary for the land managing agency

Various agencies are responsible for land management including DOI (responsible for Bureau of Land Management lands, National Parks Service); US Department of Agriculture, Department of Defense (for all military owned, managed or operations lands), and Department of Energy (which manages over 2.4 million acres across the country). The trustee for land resources is the Secretary for the relevant land management agency, however, engagement during planning, response and/or restoration may occur at the agency component level, e.g., BLM or NPS.

3240.4 Head of authorized agencies

For natural resources located in the United States but not otherwise described in this part, the trustee shall be the head of the federal agency or agencies authorized to manage or control those resources.

3300 Support Available to the FOSC

3310 Federal Agency Scientific/Technical Support

Under the NCP, the special teams and other assistance available to the on-scene coordinators can be found in 40 CFR § 300.145.

3320 Nongovernmental Organization Technical Support

Nongovernmental technical support can provide specific technical skills and resources which can supplement and support government response actions during a response. The AC is the ideal forum to identify and evaluate these resources in planning and preparedness activities. Some examples of NGO technical support resources are:

- Academic or research institution
- Wildlife groups or aquariums
- Volunteer groups.

ACPs shall establish procedures to allow for well organized, worthwhile, and safe use of volunteers, including compliance with 40 CFR § 300.150 regarding worker health and safety. The AC should evaluate where volunteers can be most effectively implemented for planning and response activities based on the specialized skills and resources they provide. ACPs should provide for the direction of volunteers by the FOSC; or, by other federal, tribal, state, or local officials knowledgeable in contingency operations and capable of providing leadership.

G. Part 4000: Pre-Spill Risk Analyses, Consultations & Response Strategies

4100 Worst Case Planning Scenarios

Include worst case planning scenarios for all transportation modes covered by your ACP to include onshore facilities, Outer Continental Shelf (OCS) facilities (e.g., mobile offshore drilling units, offshore renewable energy installations), vessels, rail, and pipelines. This should include WCD matrices comprised of an Oil Product Table and a Hazardous Substance Table. These tables should be detailed enough to develop planning scenarios.

This part should include discussion on and links to the respective ACP Annex B, *Risk Analysis Annex*. It may also include links to Contingency Planning Project/BSEE OCS WCD Technical Documents, as applicable.

4200 Pre–Spill Endangered Species Act (ESA), Section 7 Consultations

The FOSC must ensure that response actions do not jeopardize ESA listed species or habitats. A pre-spill consultation on response actions can aide the FOSC during a response, by identifying potential effects to listed species and their habitats from various response measures; and by including Best Management Practices (BMPs) to avoid or minimize those effects. When pre-spill, formal consultation results are incorporated into the ACP, it may streamline the consultation process required during the emergency response phase and enable the FOSC to respond knowing that the Services support the actions recommended in the ACP.

The FOSC must work with the District to determine who will lead pre-spill consultation activities. Working with units, RRT Co-Chairs/IMPAs should work with the Services on pre-spill, formal consultations to develop a Biological Evaluation for their respective region or Area of Responsibility (AOR). Results of pre-spill consultations must be incorporated into updates to the applicable ACPs and their Fish and Wildlife Annexes. When complete, the Fish and Wildlife Annex can support the pre-spill and emergency consultation processes, but it is not a substitution for Section 7 consultations.

4210 Preauthorization and Best Management Practices

This section should identify any preauthorizations that may be required for alternative countermeasures and/or alternative response techniques (e.g., dispersants, ISBs). It should clearly state the location, type of product, weather conditions, and any other assumptions as well as notification and mitigation requirements. This information should include a written description of the preauthorization area as well as visual graphics depicting areas of preauthorization.

In addition, this section should reference and provide links to existing BMPs for oil spill or hazardous substance response. These BMPs may be provided in response to pre-spill consultations conducted with the Services (i.e., USFWS and/or NMFS) and/or general BMPs

addressing general oil spill response actions. These best management practices should identify response action measures to reduce and avoid potential impacts on federally listed and managed species, designated critical habitat, Essential Fish Habitat (EFH), and address any cultural/historical resources. Some RRTs have developed general environmental BMPs for oil spill response to enable the FOSC to quickly implement BMPs for response actions at the onset of a response while awaiting incident-specific BMPs (to account for variances based on spilled products, and any species or location-specific concerns).

4220 Threatened and Endangered Species within AOR

This section should identify where to locate information on all threatened and endangered (T&E) species which may be present within the geographic area and should cite the location of detailed information on T&E species and who to contact for questions. A full listing of species, as well as additional information on T&E species, should be included in ACP Annex C, *Fish and Wildlife Annex*.

4300 National Historical Preservation Act (NHPA), Section 106

This part should describe SHPO or Tribal Historic Preservation Officer (THPO) protocols, as well as any existing pre-authorizations and BMPs in reference to NHPA consultations as applicable. The National Conference of State Historic Preservation Officers provides a directory of SHPOs and is available at: https://ncshpo.org/directory/.

4310 Preauthorization and Best Management Practices

Preauthorizations for NHPA are rare due to the sensitive nature of cultural sites. The best management practices may not be specific to any particular area to help safeguard the location of culturally sensitive sites. This section may instead include information on the process for acquiring best management practices during a response.

4400 Environmentally Sensitive Areas

Each ACP should identify environmentally sensitive areas and priority protection sites. This determination should consider impacts to fish and wildlife and their habitat, the resiliency or sensitivity of the area, recovery time, and seasonal concerns. Environmental Sensitivity Index (ESI) maps provide a concise summary of coastal resources that are at risk if an oil or chemical spill occurs nearby and should be referenced here. These sensitive areas should be prioritized for planning and preparedness activities such as GRS development, GRS validation, and exercises. During an incident, as in an exercise, the RP/PRP and Incident Management Team (IMT) must consider all potentially environmentally sensitive areas and areas of public concern that may be impacted for strategies to mitigate and protect valued resources and habitat.

4500 Economically Sensitive Areas

Each area may have regions of increased economic sensitivity which may require special consideration and prioritization during an incident. In some cases, the economic and

environmental sensitivities may be linked (e.g., critical fisheries or ecological tourism). This section should identify economically sensitive areas and whether the economic impacts are local, regional, or national. It is important to note that while economic sensitivity should be considered, it is not included in the National Response Priorities in NCP (safety of human life, stabilization, and minimum impact to the environment).

4600 Geographical Response Strategies (GRS)

Oil discharge recovery and protection response strategies emphasize controlling the release and spread of spilled oil to prevent or reduce contamination of sensitive resources. These strategies may include mechanical cleanup, a variety of booming techniques, removal of oiled debris, use of chemical countermeasures (e.g., dispersant use, ISBs, surface washing agents), and/or intentional wellhead ignition. The determination to activate any one of these strategies is dependent upon numerous factors, including, but not limited to: incident-specific objectives, imminent or substantial threat to human life, environmental conditions, equipment/personnel availability, and resource protection priorities. GRS may notate specific booming strategies to be implemented to protect sensitive areas and/or may identify the types of response strategies that may be effective based on the area's environmental factors and challenges. GRS may also pre-identify logistical support locations and information such as potential Incident Command Posts (ICPs), staging areas, boat ramps, anchor points for boom, etc.

Additionally, this part should describe the process that the AC follows to test and/or validate their respective GRS and the process to develop new GRSs. Additionally, it should reference how the GRS validation status is recorded and maintained (i.e., how can you find when a strategy was last validated, the level of validation, and any changes or updates). A link to the GRS should be provided in this part; the GRS are often stored as a layer within the Environmental Response Management Application (ERMA) or a state-maintained website or Geographic Information System (GIS) map. If the GRS are included as an ERMA/GIS map layer, also include the name of the layer and instructions on how to locate it.

H. Part 5000: Response

5100 Initial Reporting, Notification, and Preliminary Assessment Procedures

Discuss protocols for preliminary assessments and notification requirements to include contact information for the NRC and applicable state agency notifications. Cleanup assessment protocols should include links to applicable references such as NOAA Publications (Job Aids for Spill Response), American Petroleum Institute (API) Publications, and a link to Annex F, *Planning and Response Tools*.

5200 Emergency Consultations

This should address the various requirements such as ESA Section 7, NHPA Section 106 protocols, and tribal considerations (as applicable) to conduct emergency consultations during a response. Link to regional processes that may be included in the RCP or provided by the Services.

5300 General Hierarchy of Response Priorities

This hierarchy is generic and pulled from the NCP and RCPs. The general order is: Health and Safety of Responders and the Public, Priority Identification and Protection Strategies, Risk Assessment, Wildlife Protection and Recovery, and aligning NRDA w/Response. Link RCP Annexes, ACP Annexes, and references as applicable.

5400 National Incident Management System (NIMS)

Reference the Incident Management Handbook (IMH) and provide a brief discussion on NIMS topics to include the Unified Command (UC), FOSC, Responsible Party (RP), and Common Operating Picture (COP). Note that ERMA is the USCG COP for oil spill incidents, ICP, public information discussion (link to NRT Joint Information Center (JIC) model guidance), etc.

5500 Oil Spill Containment and Cleanup

Include general discussion on oil spill containment, shoreline protection, recovery (on-water shore-side, and shoreline) and cleanup methodologies and protocols as well as decontamination, disposal and end-points/terminating cleanup ops, etc. Link to references and resources as applicable.

5600 Oil Spill Response Funding and Cost Recovery

This section should include general information on the Oil Spill Liability Trust Fund (OSLTF) to include covered activities, accessing the fund, documentation, and cost recovery requirements and process. This section should identify how different groups would request funding through the OSLTF to include trustee, local, state, tribal, and military agencies. Documentation and Cost Recovery should include NCP Documentation Requirements and National Pollution Fund Center (NPFC) Procedures (NPFC Technical Operating Procedures (TOPs)and NPFC User Reference Guide (eURG)). General discussion on OSLTF Claims can be found here.

5700 Hazardous Substance Response

This section should include a general overview of Hazardous Substance response with links to applicable CFR citations/definitions of “Harmful Quantity,” etc. Provide discussion on pollution incidents that pose threats to public health (link to RCP or Environmental Safety Support guidance and protocols as applicable), etc. Identify state-specific Hazardous Substance Response Agency roles and responsibilities, notification requirements, and protocols. Provide language to link to

Annex D, Hazardous Substance Response for more Area-specific and/or regional guidance, protocols, and information.

5800 Hazardous Substance Spill Response Funding and Cost Recovery

This section should include general information on CERCLA to include covered activities, accessing the fund, documentation, and cost recovery requirements and processes. It should identify how different groups would request funding through CERCLA to include trustee, local, state, tribal, and military agencies. Provide documentation and Cost Recovery information to include NCP Documentation Requirements and NPFC Procedures (https://www.uscg.mil/Mariners/National-Pollution-Funds-Center/).

5900 Response Documentation Requirements

This section should include information on response documentation to include general requirements as outlined in the Marine Environmental Response and Preparedness Policy, and should include links to NPFC guidance as well as required forms and reports.

5950 Post-spill Consultations

Provide guidance and consultation procedures for actions not covered by a pre-spill or an emergency response consultation for ESA/EFH Section 7 and NHPA Section 106. Provide links to forms, any applicable RCP and ACP Annexes, and other resources to complete post-spill consultations.

I. Part 6000: Response Resources

Offer an introduction and general discussion on resources available (personnel and equipment) for mechanical recovery of the product during response operations. Do not list every resource in the area but use general descriptions of the types of resources available and provide links to respective resource inventories in applicable portions.

6100 Oil Spill Removal Organizations (OSROs) and Equipment

This section should include a brief discussion of the OSRO classification program and include OSRO Classification links for COTP Zone as applicable, Response Resource Inventory (RRI) Database information (Access), Basic Ordering Agreements (BOAs), and applicable links to resources. For Oil Spill Response Cooperatives and Consortiums (Co-ops), there should be a general discussion on what they are (if applicable in the AOR) and a list and associated links for Co-ops in the area.

6200 Hazardous Substance Response Resources

Provide a general discussion on hazardous substance response resources. Offer links to resources (to include contractors/personnel and equipment) available within the area, regionally, and nationwide. Provide language to link to the respective ACP Annex D, Hazardous Substances Annex.

6300 Salvage and Marine Firefighting Resources

Provide a general discussion on SMFF resources and technologies. Offer links to resources (to include contractors/personnel and equipment) available within the area and/or nationwide. Link to the respective ACP Annex E, *Salvage and Marine Firefighting Annex.*

J. Part 7000: Response Technologies

7100 Response Technologies for Oil Spill Response

The NCP directs the RRTs and ACs to address the use of alternative response technologies (ARTs). Policy regarding the use of ARTs should be jointly developed by the RRT and AC to include use of dispersants, ISB and burning agents, surface washing agents, and bioremediation as applicable.

This section should include general information on 40 CFR Part 300 Subpart J, a reference to the NCP Product Schedule, and information on monitoring and evaluation. It should also discuss SMART protocols specifically for dispersants and ISB, and link to SMART guidance. Include a brief overview of the Alternative Response Tool Evaluation System (ARTES), which is the process to evaluate potential "non-conventional response alternative technology" use versus established response methodologies. Also include links to forms and instructions for ARTES evaluation requests, as well as appropriate references and links to applicable RCPs and/or RRT guides/tools.

7200 Response Technologies for Hazardous Substance Response

Provide a general discussion on hazardous substance response technologies. Offer links to resources and information available within area, regional, and national plans. Link to the respective ACP Annex D, *Hazardous Substances Annex.*

K. Standard Annexes

Per the Coastal ACP Architecture, there are ten mandatory standard annexes, with three being mandatory only if applicable.

The standard annexes are provided below:

Title	Name	Description
Annex A	Master Hyperlink Annex	Mandatory; supports base plan and all Annexes
Annex B	Risk Analysis/Risk Profile Annex	Mandatory; not for public release
Annex C	Fish & Wildlife Annex	Mandatory
Annex D	Hazardous Substances Annex	Mandatory
Annex E	Salvage and Marine Firefighting Annex	Mandatory
Annex F	Response Tools Annex	Mandatory
Annex G	Voluntary Organizations Active in Disaster Annex	Mandatory
Annex H	ESF-10 Annex	Mandatory (if applicable)
Annex I	Ice Operations & Arctic/Cold Weather Response Annex	Mandatory (if applicable)
Annex J	Space Operations Annex	Mandatory (if applicable)
Annex K	Air Operations & UAV Support	Supplemental (if needed)
Annex L	Unconventional Oil Response Annex	Supplements content in base plan as needed
Annex M	Tribal Annex	Supplements content in base plan as needed
Annex N	Swift Water Response Operations Annex	Supplements content in base plan as needed
Annex O	International Coordination and Relationship to International Plans Annex	Supplements content in base plan as needed

Table 1: Standard Annexes

National Level Standard Annexes

These standard annexes are mandatory (as applicable) and contain important information for pollution preparedness and response. The basic layout, as well as the methodologies and procedures addressed, will be very similar regardless of the area; however, area-specific

information is crucial for full functionality during preparedness and response activities. Some, such as Annex C, *Fish and Wildlife Annex*, are required by the NCP; this particular Annex is referred to as the Fish and Wildlife and Sensitive Environments Plan (FWSEP in the NCP).

Annex A – Master Hyperlink Annex

Further guidance for this Annex is under development. However, how hyperlinks are used and maintained varies significantly across the country and is largely dependent on the level of support from state agencies and others. The State of Alaska hosts a website which serves as an authoritative database for all AC references and tools. Absent website support, ACs may choose to include all links in an Excel spreadsheet or similar list to facilitate the update and maintenance of hyperlinks.

Annex B – Risk Analysis / Risk Profile Annex

Additional guidance will be developed by a CG-MER sponsored Task Force. Anticipate further guidance on this annex once the Task Force has completed their efforts.

Annex C – Fish & Wildlife Annex

To provide for coordinated, immediate and effective protection, rescue, and rehabilitation of, and minimization of risk of injury to fish and wildlife resources and habitat, ACs are required to incorporate into each ACP a detailed annex containing a Fish and Wildlife and Sensitive Environments Plan (FWSEP) that is consistent with the RCP and NCP. The FWSEP annex requirements are outlined in 40 CFR 300.210(c)(4)(ii). The Fish & Wildlife Annex is to be prepared in consultation with the USFWS, NOAA, and other interested natural resource management agencies and parties. The annex will provide the necessary information and procedures to immediately and effectively respond to discharges that may adversely affect fish and wildlife and their habitat (and any other environments considered sensitive by the AC), including provisions for a response to a WCD. Such information is to include the identification of appropriate agencies and their responsibilities, procedures to notify these agencies following a discharge or threat of a discharge, protocols for obtaining required fish and wildlife permits and other necessary permits, and provisions to ensure compatibility of annex-related activities with removal operations.

Annex D – Hazardous Substances Annex

Additional guidance will be developed by a CG-MER sponsored Task Force. Anticipate further guidance on this annex once the Task Force has completed their efforts.

Annex E – Salvage and Marine Fire Fighting Annex

Additional guidance will be developed by a CG-MER sponsored Task Force. Anticipate further guidance on this annex once the Task Force has completed their efforts.

Annex F – Response Tools: Quick Response Guides, Checklists, Job Aids, etc.

This annex should contain any QRGs/QRCs, checklists, job aids, and other references and tools. Units may need to determine which information will be put in Annex A with the master hyperlinks and which information will be put in Annex F.

Annex G – Voluntary Organizations Active in Disaster

The NRT document Use of Volunteers Guidelines for Oil Spills identifies guidelines and best practices for the use of volunteers during an oil spill. This annex should contain specific information about volunteer organizations in the area and any additional guidance on the use of volunteers for a spill response.

Annex H – Emergency Support Function 10 (ESF-10)

This annex should capture information regarding any state specific programs or processes that address displaced vessels/containers, including state agencies responsible for requesting mission assignments for ESF-10.

Annex I – Ice Operations and Arctic/Cold Weather Response

This annex should outline the unique planning considerations, operational challenges, and response strategies associated with oil and hazardous substance incidents occurring in ice-covered or seasonally cold environments. Given the extreme and often unpredictable conditions in Arctic regions, including sea ice, limited daylight, remote access, and infrastructure constraints, this annex should address specialized equipment needs, seasonal deployment limitations, and interagency coordination requirements.

Annex J – Space Operations

This annex should address considerations for incidents involving space launch or reentry activities, space vehicle debris, and related hazardous materials that may impact the marine or coastal environment. With the increasing frequency of commercial and government space operations, this annex should provide a planning framework to coordinate response efforts including potential fuel spills, hazardous cargo, and debris recovery resulting from space flight anomalies or failures. This annex should outline roles and responsibilities, interagency coordination mechanisms, and environmental protection strategies.

Optional Standard Annexes

There are also five optional standard annexes that provide ACs with the flexibility to address certain operations that many areas may encounter. The basic layout and methodologies and procedures addressed in these annexes will be very similar regardless of area; however, area-specific information is crucial for full functionality during preparedness and response activities.

Annex K – Air Operations & UAV Support

This annex should outline the planning and preparedness considerations, coordination procedures, and guidance for the use of manned and unmanned aircraft during oil spill and hazardous substance response activities. Air assets play a critical role in surveillance, damage assessment, logistical support, and tactical operations, particularly in remote or inaccessible areas.

Annex L – Unconventional Oil Response

This annex should provide guidance for planning and responding to spills involving non-traditional petroleum products, including heavy crudes, diluted bitumen (dilbit), synthetic oils, biofuels, and other emerging substances that may behave differently in the environment compared to conventional oils. These products may submerge, sink, or resist traditional recovery techniques, posing unique challenges to detection, containment, and cleanup. This annex should outline response considerations, specialized equipment needs, sampling and monitoring strategies, and coordination protocols necessary to effectively manage spills of unconventional oils.

Annex M – Tribal Annex

Additional guidance will be developed by a CG-MER sponsored Task Force. Anticipate further guidance on this annex once the Task Force has completed their efforts.

Annex N – Swift Water Response Operations

This annex should outline the specialized planning, safety considerations, and response strategies for incidents occurring in fast-moving rivers, floodwaters, and other high-velocity water environments. Swift water conditions present unique hazards to responders, limit traditional containment and recovery options, and often require rapid deployment of specialized teams and equipment.

Annex O – International Coordination and Relationship to International Plans

This annex should identify any applicable international plans for the region as well as links to the MER-2 external site where the plans are located.

L. Non-Standard Annexes

Regional and area-specific annexes are included in the coastal ACP architecture. They allow for regional flexibility during response operations by outlining state and regional policies and procedures; and for local flexibility by outlining local and area-specific policies and procedures. These annexes allow ACs to address issues such as site safety and public safety protocols (e.g., air monitoring protocols, water sampling, environmental health support) as well as state-specific procedures and information (e.g., decanting, waste management, disposal), while targeting area-specific response policies and concerns using the procedures and information they developed (e.g., Surface Washing Agent Preauthorization Annex, Tar Ball Response Annex, Virginia Eastern Shore Annex).

These non-standard annexes provide readily available information without “bogging down” the base plan with details for unique aspects of a response. Note that these annexes should not be comprised of an exhaustive library of references or historical files. Applicable documents or publications should be incorporated by reference with links to authoritative sources or maintained in unit or ESC files.

Chapter 6: Plan Validation

A. Coast Guard National Review Panel (CGNRP)

The scope of the CGNRP is a targeted and strategic review of ACPs focused on consistency, trends, and emergent issues. The CGNRP serves as a review (audit-like) function and as an advisory body that assists with CG-MER policy development and ground truthing. The panel consists of representatives from CG-MER, National Strike Force, Areas, Districts, and subject matter experts (SMEs) as needed. The CGNRP establishes precepts based on a five-year review cycle during which they review all ACPs nationwide. These precepts can be found in Appendix I.

CGNRP Process

As a part of the CGNRP process, there is a standard review checklist completed by the unit and forwarded to the respective District for further review/comments. This checklist and the FOSC Annual Report are reviewed along with the respective ACP during the panel. After the conclusion of the panel, CGNRP Results Pass-back Memorandums will be provided to the FOSC with a list of improvement actions. Districts will then work with the units and ACs to adjudicate the CGNRP feedback and develop an Improvement Plan.

ACP CGNRP 5-Year Improvement Plan

Feedback from the CGNRP will be incorporated into a five-year Improvement Plan to identify both short- and long-term update and revision strategies. Required use of the *ACP CGNRP Five-Year Unit Improvement Plan Template* ensures that there is a standard and consistent approach utilized by field units and Districts to adjudicate, document, track, and report completion of Unit Improvement Actions for each precept listed in the CGNRP Results Pass-back Memorandums. To properly manage the adjudication of Unit Improvement Actions, including necessary updates to the ACP, Districts shall submit the Unit Improvement Plan to the respective area for review and approval no later than 90 days following the date of the GNRP Results Pass-back Memorandum. Within the five-year cycle, the completion status of Unit Improvement Actions shall be documented in the FOSC Annual Report.

B. Geographic Response Strategy (GRS) Validation

Validation Tiers & Strategies

It is recommended that ACs develop a GRS validation strategy. This strategy should be commensurate with risk and uncertainties as determined by the AC. As per the MERPMAN, validation levels are scalar in nature and should be discussed among subject matter experts within the AC. If not already in place, it is highly recommended that a standing GRS sub-committee or workgroup be established to facilitate this process. This GRS subcommittee can assist the FOSC in

meeting their obligation to validate all GRSs within the AOR. The GRS validation strategy and status should be addressed in the ACP.

Validation Level	Name	Description	Requirements
I	Desktop	Evaluation of GRS data by subject matter experts (i.e., natural resource trustees) in an office or workshop setting.	All data must attain Level I validation. Level I validation must be revised as the response environment dictates.
II-a	Visual Confirmation	Deployment of subject matter experts to a specified geographic area. Visual inspection of the operational environment and verification of tactical strategies. No equipment deployment.	Targeted for moderate- to high-risk areas where a degree of uncertainty exists.
II-b	Visual and Computer Simulation	All elements of II-a supplemented/augmented with computer simulations.	Targeted for moderate- to high-risk areas where a degree of uncertainty exists.
III	Equipment Deployment	Deployment of identified equipment to verify its performance in the specified operating environment.	Targeted for inconclusive Level II validation strategies. Performed in high-risk areas where rapid and efficient response is critical.
IV	Full-Scale Exercise	Deployment of all appropriate response personnel and equipment under an area full-scale exercise setting.	As dictated by the area exercise design / objectives.
V	Incident	Deployment of all appropriate response personnel and equipment for an actual incident.	Real-world event.

Table 2: Validation Tiers and Strategies

Documentation of GRS Validation

In addition to having a GRS validation strategy, ACs should have a mechanism for tracking when each GRS was last validated, the mechanism of validation, and any changes/alternations to strategies that need to be made. This documentation can be completed via a variety of means, from use of Survey 1-2-3 tools to a simple table that captures the number/name of each GRS grid, date last validated, method, and any recommendations or alterations to the GRS.

C. Exercises

Exercises are a primary means of testing and/or validating plans. Appendix G, *Exercise Project Management and Methodology*, provides a summary of the various types of exercise types ranging from discussion- to operations-based and how their purpose, structure, and goals/outcomes vary. It is advisable that planners adopt a crawl-walk-run approach in their exercise cycles and ensure that the cycles incorporate clear goals and outcomes.

The USCG's exercise program is managed by two separate policy shops inside USCG Headquarters CG-OEM and CG-MER. These two program offices have individual guidance on specific portions of the process, to include: establishing justification for an exercise, requesting exercise funding, exercise design and objectives, exercise participant coordination/execution, writing an AAR, and routing for approval. General recommendations for each step of the exercise process are provided below.

Exercise Program Management

Resources

- Emergency Management Manual Volume III – Exercises, COMDTINST 3010.13 (series)
- National Preparedness for Response Exercise Program (PREP)
- Homeland Security Exercise and Evaluation Program (HSEEP)
- Marine Environmental Response and Preparedness Manual (MERPMAN)

Process

By fostering collaboration among local agencies, industry stakeholders, and community partners, an effective exercise program enhances preparedness, improves response coordination, and ensures effective communication during oil spill emergencies. Through well-structured exercises that simulate real-world scenarios, ACs can strengthen their capabilities and build a resilient response network, ultimately minimizing the environmental impact of oil spills and protecting vital coastal resources.

Each AC's exercise program should be rooted in clear objectives which test the plan, improve proficiency, and help build cohesion as a team. The exercise program should be collaborative, deliberate, and progressive with a multi-year plan for training and exercises. The USCG

accomplishes this through the Integrated Preparedness Plan (IPP), which identifies all associated exercises for a four-year period and allocates funding. While the IPP itself is an internal USCG process, the exercises and trainings included in the IPP should be decided collaboratively by the respective AC Training and Exercise Subcommittees to ensure subcommittee participants are fully integrated into all parts of the exercise process.

The IPP operationalizes the progressive planning concepts from HSEEP, PREP, and EMM Volume 3. This progressive planning process (i.e., stepping-stone exercises) is a crawl-walk-run approach in which each exercise within a cycle builds upon previous efforts.

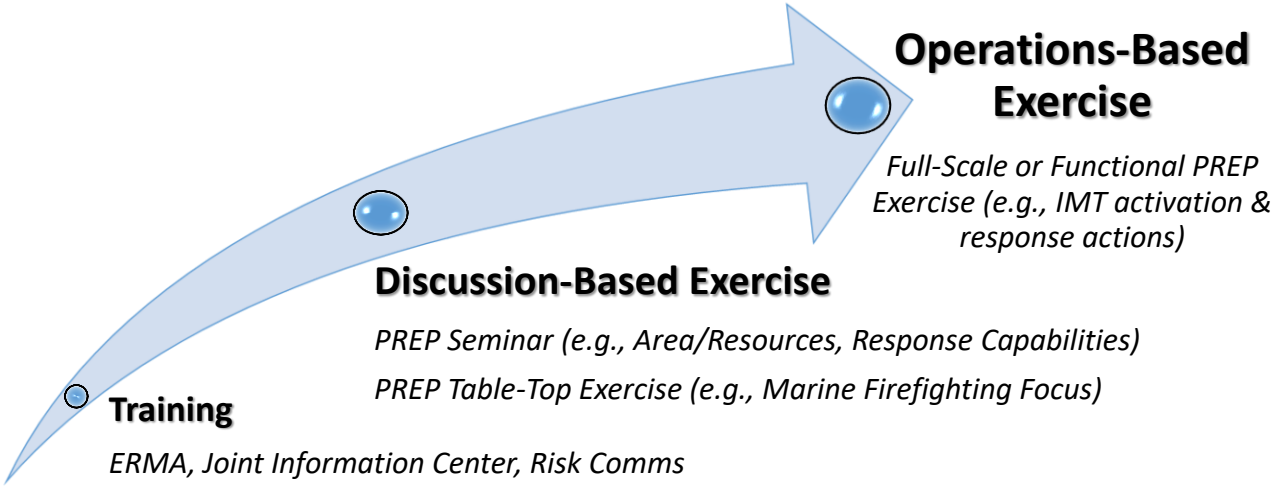


Figure 4: Exercise Program Process

Exercise Design and SMART Objectives

Industry-led vs. Coast Guard-led exercises

Industry exercise requirements are related but separate from USCG exercise requirements. The most recent version of the MERP CI outlines the USCG responsibilities as written below.

> *"The Coast Guard must serve a primary role with respect to exercise design and planning. However, other Area stakeholders (including industry) should play a prominent supporting and/or partnering role in exercise design and planning; and may serve as the host of a Coast Guard Area exercise."*

All Area exercises must be USCG-led and focus on testing and evaluating the contents of ACP. Industry plans may be exercised concurrently, if the ACP is the primary focus of the exercise.

PREP Guidelines

The PREP Guidelines provide a structured framework for planning, conducting, and evaluating exercises related to emergency preparedness and response. Developed to enhance coordination among federal, tribal, state, and local agencies, as well as private sector partners, the PREP guidelines emphasize the importance of realistic scenarios and measurable objectives. They

promote a comprehensive approach to testing and improving response capabilities, ensuring that participants can effectively manage emergencies. By fostering collaboration and shared learning, the PREP guidelines aim to build a more resilient response community.

The PREP Guidelines emphasize the importance of SMART objectives—Specific, Measurable, Achievable, Relevant, and Time-bound. These objectives help ensure that exercise planning is clear and focused.

- Specific: Objectives should clearly define what is to be achieved.
- Measurable: There should be criteria to assess progress and success.
- Achievable: Objectives should be realistic given available resources and constraints.
- Relevant: Objectives must align with overall goals and priorities of the response efforts.
- Time-bound: A clear timeframe should be established for achieving the objectives.

Incorporating SMART objectives enhances the effectiveness of exercises, ensuring that they are practical and lead to actionable outcomes for improving preparedness and response capabilities.

Generally, all functional elements of the ACP must be exercised over a four-year cycle. To facilitate this, the PREP Guidelines identify 15 core components for exercise to evaluate command and coordination, resource management, communication, and decision-making processes. The full list of components can be found in the PREP Guidelines as *Appendix A, Core Components for Exercising Response Plans.*

While ICS is an important part of the exercise, it is only one component of many that must be tested. The goal of the PREP Exercise Program is to test/validate the ACP. Since ICS training opportunities can easily overtake the exercise objectives, it is highly recommended that primary players be experienced/qualified in their positions and limit training positions to no more than one or two break-ins per role. This will allow training opportunities while ensuring the exercise remains focused on the ACP.

Exercise Evaluation

Being well-versed in the ACP enhances the quality of the evaluation, leading to more effective recommendations for improving oil spill response efforts. The ACP outlines the specific protocols, resources, and responsibilities necessary for effective response to oil spills in each area. Familiarity with the ACP is essential for USCG members when evaluating an oil spill exercise for several reasons:

- Enables participants to assess whether the exercise aligns with established guidelines and identify any gaps in execution.

- Allows members to evaluate the coordination among various agencies and stakeholders, as the plan typically involves multiple parties. This understanding helps identify areas where communication or collaboration can be improved during a real incident.
- Helps members recognize local environmental sensitivities and logistical considerations, ensuring that evaluation focuses on the most relevant challenges.

An effective evaluation of a USCG oil spill exercise covers several key components:

- Clear Objectives: Establishing specific, measurable objectives for the exercise helps focus evaluation efforts and provides criteria for success. Members should have detailed exercise evaluation guides (EEGs) that clearly outline key tasks and critical components as part of the evaluation criteria to determine if each objective was met.

- Diverse Participation: Involvement of multiple agencies, stakeholders, and organizations on the exercise evaluation team enhances collaboration and ensures that all relevant perspectives are considered during evaluation.

- Structured Observation and Data Collection: Designated evaluators that are well-versed in the ACP should systematically observe the exercise, collecting qualitative and quantitative data on performance, decision-making, and resource utilization.

- Debriefing Sessions: Conducting debriefs (or hotwashes) with the evaluators and exercise participants immediately after the exercise allows participants to share insights and observations, facilitating a thorough discussion of what worked and areas for improvement.

- Follow-Up Action Plan: An effective evaluation should include a plan for implementing recommended changes and addressing identified gaps, ensuring that LL translate into enhanced preparedness for actual spill responses.

By integrating these elements, the USCG can ensure that its oil spill exercise evaluations are both thorough and constructive, ultimately improving the ACP and thus response capabilities.

Drafting the After-Action Report (AAR)

The purpose of an AAR is to capture LL, best practices and recommended improvements identified during exercises, planned events, and real-world incidents for the benefit of your unit and other units in enhancing USCG preparedness. CG-OEM-3 (After-Action Reporting and Analysis Division) provides guidance on AAR drafting and approval and manages the Corrective Action Program, which funds items identified in AARs. An AAR should include the following:

- Context of what happened during the exercise/event/incident
- Root cause analysis of issues, including what happened, and potential solutions

- List of objectives and how they were met or why they were not met or partially met
- Information on LL/best practices
- Description of support and logistics utilized
- Examples of products developed (attachments) which may be useful to others.

Exercise AARs should capture how the objectives of the exercise addressed the core components outlined in the PREP Guidelines and identify how the event ties into the broader PREP exercise cycle.

AARs play a vital role in shaping oil spill response policy and securing funding for corrective actions. By systematically analyzing the successes and shortcomings of oil spill responses, AARs identify specific areas where improvements are needed, such as response time, coordination among agencies, and resource allocation. This evidence-based approach informs policymakers about the effectiveness of current strategies and highlights gaps that require attention.

Moreover, AARs provide a compelling rationale for funding requests by demonstrating the necessity of additional resources, training, and equipment. By presenting data and case studies from actual incidents, the reports advocate for investments that enhance future response capabilities. Ultimately, the insights gained from AARs drive policy reforms and funding allocations that strengthen preparedness and mitigate the impact of future oil spills, ensuring a more effective and coordinated response framework.

Units should be sure to identify in detail any corrective actions (CAs) and how those CAs impacted effective response. These details can be submitted through the Corrective Action Program (CAP) for funding, resources, and policy changes. The CAP ensures that lessons identified become LL to improve our planning and response system.

Submitting the AAR for Approval

Each AAR must be completed within timelines promulgated by OEM for several reasons:

- Ensures that the details of an operation are fresh in the minds of participants, leading to more accurate and comprehensive assessments. This immediacy helps capture critical insights that might be lost over time.
- Facilitates quicker implementation of recommended changes, allowing organizations to address weaknesses and enhance operational effectiveness without delay. This is particularly important in dynamic environments like oil spill response, where conditions can change rapidly.
- Supports accountability and transparency, fostering trust among stakeholders and the public. By demonstrating a commitment to continuous improvement and proactive risk management, organizations can enhance their credibility and operational readiness for future challenges.

While not all AARs require command approval, it is important to ensure that the command is aware of any key LL and resulting corrective actions, especially if the corrective action involves another unit or program. If Sectors and/or subordinate commands assign CAs to another unit, it is critical that the CA be discussed with the District CAP manager prior to submitting the AAR for approval, to ensure awareness and determine the appropriate method or recommendation for adjudication.

D. After-Action Report / Lessons Learned

Incident information requirements do not end when the incident ends. AARs, LL, and corrective action management are vital components of the USCG's preparedness cycle. The Coast Guard After Action Program (CGAAP) and Corrective Action Program (CAP), COMDTINST 3010.19 (series), establishes policy, guidance, and responsibilities for the CGAAP to document and act on lessons identified in contingency operations and exercises.

Contingency Preparedness System (CPS)

The CGAAP mandates the use of the Contingency Preparedness System (CPS), managed by CG-OEM, as the official repository for CGAAP-related information. The CGAAP aims to facilitate organizational learning, enhance operational effectiveness, and improve contingency preparedness. This is accomplished through prompt submission of the AAR/LL following contingency operations and exercises, diligent implementation of corrective actions identified in these AARs, and leveraging CPS to swiftly access data on exercises, actual events, LL, and corresponding corrective measures. Capturing and sharing LL also fosters a culture of organizational learning and adaptation, ultimately leading to improved performance and readiness for future emergencies nationwide.

Having AAR/LL data readily available in CPS aids in informing emergency response operations, supports policy development and updates, and increases senior leadership's awareness of challenges and areas for improvement in USCG contingency response operations. The CGAAP outlines the circumstances that necessitate submitting an AAR to CPS; these requirements are described below.

Exercises

An AAR must be submitted to CPS following any contingency exercises planned and funded through the USCG's multi-year training and exercise plan (MTEP) development process. ICs at all levels are also required to document and submit any significant LL.

Real-World Events

The CGAAP also requires submission of an AAR to CPS for any Type 1 or Type 2 contingency response operations, or as directed by the FOSC. As with exercises, ICs at all levels must also

capture and submit significant LL. Accurately capturing real-world incident information via AAR/LL is vital for ACs and FOSCs, as it significantly enhances response effectiveness and preparedness.

RRT/NRT Requested FOSC Report Guidance

FOSC reports detail the specifics of incidents involving major oil spills or hazardous substances, as well as incidents with notable political, public, environmental, or economic significance. When requested by the NRT, respective RRT, or CG-MER, FOSCs *must* submit an FOSC report. These reports offer a chance for an internal USCG evaluation of actions taken in accordance with the NCP to address and mitigate such discharges or releases, with the goal of enhancing marine environmental response preparedness. Unlike an Incident Specific Preparedness Review (ISPR), which is conducted by independent review teams to provide an impartial evaluation of the USCG's response, FOSC reports are written from the FOSC's perspective. Note that these are separate from FOSC annual reports, which are utilized to capture AC accomplishments, best practices, challenges, and recommendations. Additionally, AARs generally capture recommendations and LL for Type 1 or 2 real-world incidents, or when prescribed by the chain of command. If an FOSC report also includes this material, Commandant (CG-MER) must, in cooperation with the submitting unit, review the lessons for applicability and ensure their entry into CPS.

E. Evolving Risks and Technologies

Area planners and interagency responders must stay informed about evolving risks and emerging technologies to effectively address the dynamic challenges facing the marine environment. Extreme weather events, increasing Arctic activity, and novel pollutants such as microplastics present new threats that demand proactive mitigation strategies.

Effective coordination with interagency and industry partners under the NRS and ACs requires an understanding of next-generation vessel designs, onboard pollution control systems, and AI-driven monitoring tools. As environmental regulations evolve, USCG personnel must also stay updated on changes to MARPOL Annexes, the OPA 90, and ballast water regulations to ensure compliance and enforce best practices. Emerging digital technologies, such as satellite imagery, drone surveillance, and predictive modeling, enable faster and more effective decision-making, allowing responders to predict oil spill movement and optimize resource deployment.

Additionally, public expectations for environmental accountability are rising, making it imperative for the USCG to demonstrate its ability to respond effectively and minimize ecological harm. By integrating new technologies, refining response strategies, and adapting to regulatory changes, the USCG ensures its operational effectiveness, strengthens interagency collaboration, and upholds its mission as a global leader in maritime environmental stewardship.

Following is an overview of some relevant emerging technologies. These descriptions will be updated as necessary by MER, based on feedback and input from AC planners and other interagency partners.

Alternative Fuels

The maritime industry is undergoing a significant shift towards alternative fuels, driven by environmental regulations and the pursuit of decarbonization. This transition introduces a new layer of complexity to oil and hazardous substance area contingency planning. With a rising number of vessels powered by fuels like Liquefied Natural Gas (LNG), methanol, ammonia, hydrogen, and biofuels entering service, responders must expand their knowledge base and adapt existing strategies.

Potential incident scenarios now encompass hazards beyond traditional petroleum products, including cryogenic risks associated with LNG spills, the potential for toxic and flammable vapor clouds from methanol or ammonia releases, unique fire behavior characteristics of hydrogen flames, and the challenges of handling biofuel spills. Furthermore, the lack of widespread infrastructure and specialized equipment for handling these fuels necessitates proactive resource identification and pre-planning. Each ACP should include fuel-specific hazard assessments, appropriate response tactics, and specialized equipment needs to ensure effective mitigation and minimize environmental impact during incidents involving alternative fuel vessels. Understanding these nuances is crucial for maintaining the safety of responders and the integrity of our coastal environments in this rapidly changing landscape.

Lithium-Ion Batteries

The proliferation of lithium-ion batteries across various sectors, including maritime transportation and energy storage systems, introduces a growing concern for area contingency planning. While offering advantages in energy density and performance, these batteries pose unique challenges when involved in fire incidents. Lithium-ion battery fires are characterized by intense heat, rapid propagation (thermal runaway), the release of toxic and flammable gases (including hydrogen fluoride), and the potential for re-ignition even after initial suppression. Traditional firefighting methods may prove ineffective, requiring specialized extinguishing agents and cooling techniques. Furthermore, the risk of electric shock, the potential for battery explosions, and the need for containment of contaminated runoff present significant hazards to responders and the environment.

ACPs should address these evolving threats in a Marine Firefighting plan which provides guidance on identifying vessels and facilities with significant lithium-ion battery installations, developed pre-incident planning strategies, identification of appropriate personal protective equipment (PPE), and effective firefighting tactics. Proactive planning and specialized training are essential to safely and effectively mitigate the risks associated with lithium-ion battery fires. CG-MER is currently developing a SMFF Job Aid which will inform the development of area specific SMFF plans.

Offshore Renewable Energy

The rapid expansion of U.S. offshore renewable energy, particularly in the wind sector, presents a paradigm shift in the maritime landscape. While significantly lower than those associated with traditional oil and gas operations, oil spill risks do exist, primarily from operational fluids used in wind turbines, offshore substations, and maintenance vessels. Mechanical failures, vessel accidents, extreme weather events, improper storage, and decommissioning activities all pose potential spill risks and should be incorporated into planning, exercise, and preparedness efforts. These risks encompass not only lubricants and hydraulic fluids, but also dielectric fluids used in offshore substations, which pose unique challenges due to their odorless and colorless nature, complicating detection and recovery efforts. The development of floating offshore wind technology is still in its early stages but will provide additional challenges. To mitigate these risks, robust design standards, regular maintenance, rigorous oversight of vessel operations, and implementation of industry best practices, including the use of "environmentally friendly" lubricants and fluids, further reduce the likelihood and impact of spills. In close coordination with BSEE, which is the lead regulatory agency, comprehensive interagency regional planning and preparedness, coupled with spill prevention and response protocols, are crucial to ensure the environmental sustainability of this burgeoning sector.

Advanced Information Management

In environmental protection, common operating picture (COP) tools are invaluable for tasks like monitoring natural resources, assessing ecological impacts, and managing disaster response efforts. For example, Geographic Information Systems (GIS) can map sensitive habitats, track pollution sources, or model environmental risks, while tools like Survey 1-2-3 streamline field data collection, ensuring accurate and timely reporting. By centralizing data and facilitating communication, these tools improve the efficiency, accuracy, and adaptability of environmental initiatives, ultimately advancing sustainability and resilience objectives.

A COP tool, such as GIS, Survey 1-2-3, and other advanced information management systems, is essential for the effective coordination and execution of environmental protection projects and programs. These tools integrate diverse data sources—spatial, temporal, and observational—into a unified platform, enabling stakeholders to visualize, analyze, and share information in real-time. This enhances situational awareness, supports decision-making, and fosters collaboration across teams, agencies, and communities.

Using GIS in managing environmental protection projects offers several key benefits:

1. Enhanced Data Visualization: GIS allows for the spatial representation of environmental data, making it easier to identify patterns, trends, and relationships in environmental conditions.
2. Improved Decision-Making: By integrating multiple data sources, GIS supports more informed and data-driven decisions, helping to prioritize areas for conservation, restoration, or intervention.

3. Efficient Resource Management: GIS helps in the effective allocation of resources by identifying critical areas that require immediate attention or where environmental projects can have the greatest impact.
4. Monitoring and Compliance: GIS enables continuous monitoring of environmental conditions, helping to track changes over time and ensuring compliance with environmental regulations.
5. Risk Assessment and Mitigation: GIS can model and predict environmental risks, such as flooding, erosion, or habitat loss, allowing for proactive mitigation measures to be implemented.
6. Public Engagement and Communication: GIS maps and visualizations can be used to communicate complex environmental issues to the public and stakeholders, fostering better understanding and support for environmental initiatives.
7. Support for Environmental Impact Assessments (EIAs): GIS aids in conducting EIAs by providing a comprehensive view of the potential impacts of proposed projects on the environment, helping to avoid or mitigate negative outcomes.

Overall, GIS is a powerful tool that enhances the efficiency, accuracy, and effectiveness of environmental protection efforts.

Appendix A: List of Abbreviations

Abbreviation	Definition
AAR	After-Action Report
AC	Area Committee
ACP	Area Contingency Plan
AOR	Area of Responsibility
BMPs	Best Management Practices
CFR	Code of Federal Regulations
CG-MER	Commandant Office of Marine Environmental Response Policy
CGNRP	Coast Guard National Review Panel
COTP	Captain of the Port
CPS	Contingency Preparedness System; (USCG CPS)
DOI	Department of the Interior
EPA	U.S. Environmental Protection Agency
ERMA	Environmental Response Management Application; *(NOAA ERMA)*
ESA	Endangered Species Act
FOSC	Federal On-Scene Coordinator
FWSEP	Fish and Wildlife and Sensitive Environments Plan
GIS	Geographic Information System
IC	Incident Commander
IMPA	Incident Management Preparedness Advisor *(U.S. Coast Guard)*
LEPC	Local Emergency Planning Committee

Abbreviation	Definition
LL	Lesson Learned
MERPMAN	Marine Environmental Response and Preparedness, COMDTINST M16000.14 (series)
MOA/MOU	Memorandum of Agreement / Memorandum of Understanding
NCP	National Contingency Plan
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPFC	National Pollution Fund Center
NSF	National Strike Force
OPA	Oil Pollution Act of 1990
PREP	Preparedness for Response Exercise Program
RCP	Regional Contingency Plan
RRT	Regional Response Team
SHPO	State Historic Preservation Officer
SOSC	State On-Scene Coordinator
THPO	Tribal Historic Preservation Officer
UAS / UAV	Unmanned Aircraft System / Unmanned Aerial Vehicle
UC	Unified Command
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service

Appendix B: Tools

Provided below are some tools that may be helpful for USCG emergency managers related to AC and ACP management. This is not intended to be an exhaustive list, but should provide a stepping stone for awareness of the types of tools that are available to assist in planning and response efforts. AC member agencies, industry, NGOs, and other participating organizations may have additional tools particular to a specific region or function that could provide value to ACP planning efforts.

A. Coast Guard Job Aids (Internal Access Only)

There are numerous job aids available to assist USCG Emergency Management Staff in conducting ACP and AC Management activities. The following job aids can be found on the CG-OEM-1 SharePoint Site (Emergency Management Plans & Exercises Division (CG-OEM-1) - EMSEC Job Aids - All Documents (sharepoint-mil.us):

- Emergency Management Partners, Stakeholders, and Resources Job Aid
- Comprehensive Job Aid for Emergency Management Staffs
- Updating Emergency Management Plans Job Aid
- Concept of Exercise (COE) Job Aid
- Discussion-Based Exercises Job Aid
- Operations-Based Exercise Job Aid
- After-Action Report (AAR) Program Job Aid
- Corrective Action Program (CAP) Job Aid.

B. Planning Tools

- Emergency Response Management Application (ERMA): Online mapping tool that integrates both static and real-time data, such as Environmental Sensitivity Index (ESI) maps, shop locations, weather, ocean currents, and other environmental data, into a centralized, easy-to-use format for environmental responders and natural resource decision makers. This tool provides a common operating picture for environmental data to inform emergency response efforts.
- Information for Planning and Consultation (IPaC): Tool to quickly and easily identify U.S. Fish & Wildlife Service (USFWS) managed resources to assist in determining how proposed activities may impact sensitive natural resources and how to mitigate those impacts.
- OILMAP: OILMAP is an oil spill modeling system suitable for use in oil spill response and contingency planning. Oil spill modeling using OILMAP provides rapid predictions of the

movement of spilled oil. A comprehensive 3D model is included that tracks various hydrocarbon components on the water surface, in the water column, and in the air. Many USCG Districts have licenses for OILMAP software and can assist ACP managers with oil spill modeling for purposes of GRS validation and/or exercise design.

- ArcGIS Survey 123: An ArcGIS tool that can be utilized to develop surveys or forms though a web or mobile app to capture information and then visualize the information into maps, charts, tables, and/or dashboards. This tool can be utilized for planning and response decision-making to include GRS validation, wildlife surveys, shoreline cleanup assessment techniques (SCAT), etc.

C. Project Management

There are a variety of simple project management resources available that can enhance efficiency and effectiveness. Here are some key resources for consideration:

Project Management Institute (PMI)

- PMBOK Guide: The Project Management Body of Knowledge (PMBOK) is a comprehensive guide that outlines standard practices and guidelines for project management. It is a valuable resource for understanding fundamental project management principles.
- Online Courses and Certifications: PMI offers online courses and certifications, such as the Project Management Professional (PMP) certification, which can provide in-depth knowledge and skills in project management.

U.S. Environmental Protection Agency (EPA) Resources

- Project Management Handbook: EPA provides a handbook specifically tailored to environmental project management. It includes guidelines, best practices, and tools for managing environmental projects.
- EPA Environmental Dataset Gateway: This online platform offers access to a wide range of environmental data, which can be essential for project planning and execution.

Gantt Charts and Project Planning Tools

- Microsoft Excel: Excel's One-Page Project Management template is an easy-to-use document that provides a project management tool for interagency project management coordination.
- Microsoft Project: A powerful tool for creating Gantt charts, scheduling tasks, and managing resources. It's user-friendly and widely used in government agencies.
- Mobile device apps (e.g., Trello, Monday): These simple and intuitive project management tools use boards, lists, and cards to organize tasks. They are useful for visualizing project progress and managing team collaboration.

Environmental Management Systems (EMS)

- ISO 14001 Standard: This international standard provides a framework for effective environmental management systems. It helps organizations improve their environmental performance through more efficient resource use and waste reduction.
- EPA's EMS Implementation Guide: A practical guide for implementing an EMS, including templates and examples tailored to federal agencies.

Online Collaboration and Communication Tools

- Microsoft Teams: A collaboration platform that facilitates communication through chat, video and voice calls, and file sharing, while integrating seamlessly with Office 365 tools for real-time document collaboration. It also supports task management and third-party app integration, providing a secure and efficient environment for teamwork and project management.

  Google Workspace: A suite of productivity tools including Google Docs, Sheets, and Drive, which facilitate document collaboration and storage.

  Band or Slack: Messaging apps for teams that support real-time communication, file sharing, and integration with other project management tools.

Training and Workshops

- Federal Acquisition Institute (FAI): Offers training and certification programs related to project management and acquisition within the Federal Government.
- EPA's Office of Environmental Information (OEI): Provides training sessions and workshops on various aspects of environmental project management.

Templates and Checklists

- Project Charter Templates: Templates for creating project charters that define project scope, objectives, and stakeholders.
- Risk Management Checklists: Checklists to identify, assess, and mitigate risks throughout the project lifecycle.

U.S. Environmental Protection Agency (EPA) Grant Resources

- Grant Application Guidance: EPA offers detailed guidance on applying for and managing grants, which is critical for projects funded through federal grants.
- Grants Management Training: Training programs that cover the essentials of managing EPA grants effectively.

These resources provide a solid foundation for AC Managers, planners, and members of all types to manage projects efficiently, ensure compliance with regulations, and achieve environmental objectives.

D. Document Management

What is an Information Management Plan?

An Information Management Plan (IMP) is a strategic document that outlines how an organization will manage, store, secure, and utilize its data and information resources. The plan typically includes guidelines for data governance, storage solutions, access controls, data quality management, and compliance with legal and regulatory requirements. It ensures that information is organized, accessible, and protected, facilitating better decision-making and operational efficiency. Review Appendix J for an example Information Management Plan that uses Microsoft 365.

Appendix C: Sample AC Meeting Agendas

A. Sector Delaware Bay Area Committee

Sector Delaware Bay – In-person & Virtual Area Committee Meeting Agenda
Meeting: October 19, 2022 (1000 – 1145)
TTX: 1200 - 1400
Location: DNREC Facility 901 Pilottown Road, Lewes DE
Facilitator: LCDR Kennedy **Recorder: Jerry Conrad**

Virtual Option:
Microsoft Teams Meeting
Join on your computer or mobile app
Click here to join the meeting

(1) Opening & Welcome	LCDR Kennedy
a. Introductions	
b. FOSC-Chair	CAPT Theel
c. Director of Sussex County Operations Center	Joe Thomas
(2) Area Committee Business	
a. Tech Specialist – Seats Expire Dec 2022	Coast Guard
i. Open Seat Brief	
b. Salvage and Marine Firefighting Sub-Committee Brief	Coast Guard
c. Environmentally Sensitive Area Survey Brief	Survey Participant(s)
d. Government Led PREP Exercise 2023	Coast Guard
i. C&O: 25 Jan 2023	
ii. IPM: 22 Feb 2023	
iii. MPM: 12 Apr 2023	
iv. MSEL: 10 May 2023	
v. FPM: 14 Jun 2023	
vi. Exercise: 09 August 2023	
e. Recent Incidents:	
i. Broadkill Beach Tar Balls & YNOT- 6 Barge fire	CG & Aaron Warren of Bowers Beach FD
(3) Presentations	
a. Southern DE local brief	Joe Thomas
b. Environmental Protection Presentation	Coast Guard
i. Area Committee	
ii. Area Contingency Plan	
iii. Geographic Response Strategies	
c. Pinniped (seals) Update 2022	Bennett Anderson
d. Protecting Delaware's Seasonal Seal Colony During an Oil Spill	Suzanne Thurman
(4) Agency Reports	
a. Federal Agency Reports	As Necessary
i. Bureau of Safety & Environmental Enforcement	John Calvin
b. State Agency Reports	As Necessary
(5) Upcoming Meetings, Training, and Events	
(6) Break	
(7) Tabletop	
a. Seasonal issues/concerns if a spill occurs in lower Delaware Bay	All

(8) Tours available of:
a. Delaware Bay and River Co-operative vessel - DELRIVER – (700 Pilottown Road)
b. Marine Education, Research & Rehabilitation Institute – (801 Pilottown Road)
c. Lewes Fireboat – (DNREC Facility)

Upcoming Meetings & Training Opportunities 2022 & 2023

Meeting or Training	Date	Additional Info
Area Committee Meeting	19 Oct	DNREC Facility, 901 Pilottown Road, Lewes, DE
Clean Gulf	8-10	Ernest N. Morial Convention Center in New Orleans, LA.
Regional Response Team 3	6-8 Dec	Bethany Beach, Delaware
Executive Steering Committee Meeting	Jan 5, 2023	SecDelBay
Area Committee Meeting	18 Jan	SecDelBay
Concept & Objectives Meeting (Possibly Initial Planning for PREP FE if C&O meeting is short)	25 Jan	SecDelBay
Initial Planning Meeting for PREP FE	22 Feb	SecDelBay… This meeting may be cancelled depending on accomplishments of meeting on 25 Jan
Shoreline Clean-up Assessment Technique	4-6 Apr	Contact Dave Pugh at: david.e.pugh1@uscg.mil to request a seat Area Committee encouraged to attend
Executive Steering Committee Meeting	6 Apr	SecDelBay
Clean Waterways	11-13 Apr	Hilton Denver City Center, Denver, CO
Mid- Period Planning Meeting for PREP FE	12 Apr	SecDelBay
New Jersey Emergency Preparedness Conference	17-21 Apr	Hard Rock Hotel & Casino Atlantic City, 1000 Boardwalk, Atlantic City
Area Committee Meeting	26 Apr	SecDelBay
Regional Response Team 3	2-4 May	Location not selected
Master Scenario Events List	10 May	SecDelBay
Delaware SERC sponsored 16th Annual Hazardous Materials Training Workshop	12-13 May	Workshop is open to all DE, NJ, PA Fire Service, EMS, Law Enforcement, HazMat Teams, Industrial Brigades and Chemical Industry Safety & Health Personnel
Final Planning Meeting for PREP Exercise	14 Jun	SecDelBay
Executive Steering Committee Meeting	13 Jul	SecDelBay
Area Committee Meeting	26 Jul	SecDelBay
PREP Exercise	9 Aug	Venue location – To Be Determined
Executive Steering Committee Meeting	5 Oct	SecDelBay
Area Committee Meeting	18 Oct	Local Community location – To Be Determined (TBD)

Exercises 2022 & 2023

PREP - Notification Drills & Government Initiated Unannounced Exercises (GIUE)	4 in 2022 4 in 2023	Drills initiated by Sector
SecDelBay ACP Oil TTX 2022	19 Oct 2022	Big Stone Anchorage spill scenarios
Marine Firefighting Seminars	12-13 May & 17-21 Apr 2023	Seminars will be given at the Delaware SERC sponsored 16th Annual Hazardous Materials Training Workshop and the NJ Emergency Preparedness Conference
SecDelBay ACP Coastal Inlet Booming - Surveys	Summer 2023	Salem River to Nantuxtent River (NJ side)
Severe Weather / Marine Transportation System Recovery FE 2023	17–21 Jul 2023	All USCG District 5 Units
SecDelBay ACP PREP FE 2023	09 Aug 2023	Big Stone Anchorage spill scenario
Discarded Military Munitions Response TTX 2023	TBD	

B. Arctic & Western Alaska Area Committee

ARCTIC AND WESTERN ALASKA AREA COMMITTEE MEETING

May 7th, 2024

Location:
University of Alaska
Gorusch Commons
3700 Gagnon Lane
Anchorage AK 99508

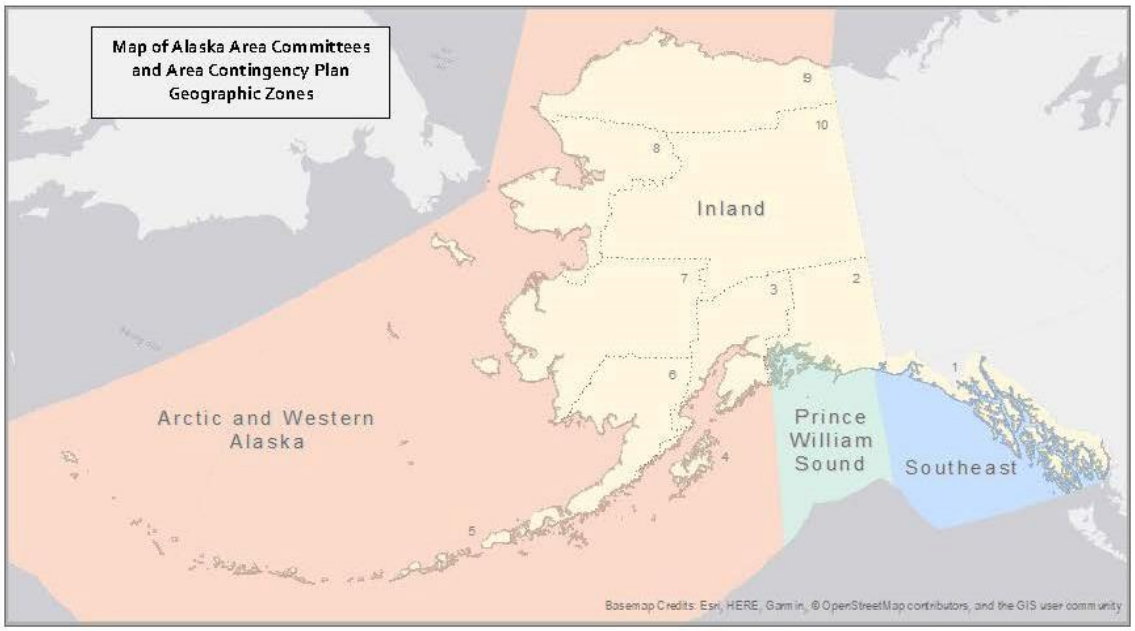
Web Conference:
Join the meeting now

Teleconference
+1 410-874-6742
ID: 375116552#

What is an Area Committee?
The Clean Water Act, as amended by the Oil Pollution Act of 1990, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) mandate that an Area Committee exist within each inland and Coast Guard Captain of the Port Zone. The Area Committee must: (1) Prepare for its area the Area Contingency Plan; (2) Work with federal, tribal, state and local officials to enhance the contingency planning for those officials and to assure preplanning of joint response efforts, including appropriate procedures for mechanical recovery, dispersal, shoreline cleanup, protection of sensitive environmental areas, and protection, rescue and rehabilitation of fisheries and wildlife; and (3) Work with federal, tribal, state, and local officials to expedite decisions for the use of dispersants and other mitigating substances and devices.

Where can you obtain more information about Area Committees and Area Contingency Plans?
http://alaska.gov/go/7EKN

Meeting presentations available for download at https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/arctic-western-area/



Area Committee Boundaries:

Three Coastal: The Arctic and Western Alaska Area, Prince William Sound Area, and the Southeast Area mimic the Captain of the Port Zones and extend seaward 200 nautical miles to the Economic Exclusion Zone. These Areas also extend inland 1,000 yards.
One Inland: The Inland Area extends from the coastal areas; beginning 1,000 yards inland

Geographic Zones:

Zones mimic the boundaries of the superseded 10 subareas: 1) Southeast Alaska, 2) Prince William Sound, 3) Cook Inlet, 4) Kodiak Island, 5) Aleutians, 6) Bristol Bay, 7) Western Alaska, 8) Northwest Arctic, 9) North Slope, and 10) Interior Alaska

Draft Agenda

0900: Sign-in
0930: OSC Opening Comments

Business Meeting

0945: Subcommittee Status Reports
1005: ***Break***

Pollution Response Topics

1020: Point Lay Case Study
1050: Genius Star Case Study
1120: Point Thomson Export Pipeline Spill
1200-1300 ***Lunch***

Pollution Response Topics (cont.)

1330: BSEE ACP Worst Case Discharge
1430: ***Break+ Refreshments***
1445: Western Alaska Oil Spill Planning Criteria with remarks from CG-MER
1530: ***Break***
1545: Geographic Response Strategies
1610: Public Comment, Closing Remarks & Discussion of Next Meeting

Appendix D: Example Charter (Arctic and Western Alaska)

Arctic and Western Alaska Area Committee

Area Contingency Plan Administration Subcommittee

Prepared By: LCDR Matt Richards and Victoria Colles

Date: April 7, 2023

The purpose of establishing subcommittees is to enable the Arctic and Western Alaska (AWA) Area Committee (AC) to undertake a more diverse and significant set of work tasks than would otherwise be possible. Subcommittees, therefore, are tasked with taking on specific work on behalf of the Area Committee and report directly to the AWA AC Steering Committee via the Area Committee Secretary or his/her designee. As such, subcommittees:

Represent the entire AWA AC in the conduct of their work; and

Are responsible to the Steering Committee in terms of defining the work to be conducted, informing the Area Secretary regarding progress and unanticipated challenges, and reporting their findings in a helpful and timely fashion.

In addition to accomplishing the tasks defined for each subcommittee, subcommittee work will have the broader goal of enhancing the knowledge base of team members around the critical issue areas on which they are working.

Subcommittee Objectives

Primary Objective:

Continuously review, update and maintain version control over the Area Contingency Plan. Ensure relevant federal and state plan requirements are met and agency policy mandates are followed.

Sub-Objectives:

- Ensure the ACP remains an operational response document, written for emergency responders, emphasizing ease of use to the greatest extent possible.
- Develop an electronic version of the ACP that can be distributed through a variety of EPA and USCG authorized websites.
- Ensure federal processes for informal tribal consultation and Alaska state public comment requirements are met for each plan version.
- Ensure Coast Guard annual and 5-year ACP review and reporting requirements are met.
- Coordinate with GRS, and Exercise and Training Subcommittees, as required.

Subcommittee: The ACP Administration Subcommittee Chair and Vice Chair shall be appointed in writing by the AWA AC Steering Committee. The ACP Administration Subcommittee Chair must be a member of the Arctic and Western Alaska Area Committee. The Vice Chair may be selected from members or members-at-large from the Arctic and Western Alaska Area Committee. Members should expect to serve for two years in their position in the subcommittee. Membership will be reviewed and validated annually by the AWA Steering Committee.

Subcommittee Meetings

Meeting Schedule and Process

The subcommittee will meet at a minimum quarterly to accomplish established objectives within timelines set by the AWA AC steering committee. Subcommittee meetings do not require a quorum. The Chair and Vice-Chair shall maintain awareness of the subcommittee's progress and any issues regarding project advancement. Subcommittees should attempt to reach consensus on activities. If consensus cannot be reached, the subcommittee chair will forward the issue with a recommendation, along with any other options for resolution of the issue, to the AWA AC Steering Committee via the Area Committee Secretary for final decision. The subcommittee chair will provide progress updates at any scheduled AWA steering committee meeting.

Meeting Agenda

Subcommittees establish their own agendas or follow the agenda outlined below:

- Introductory items, such as objectives review
- Review project(s) status and timeline update
- Conduct/initiate subcommittee activities
- Review progress and summarize new actions planned as a result of the meeting
- Plans, date and location for next meeting .

Current Subcommittee Tasking and Deadlines

- In addition to fulfilling the overall subcommittee objectives listed above, the Steering Committee directs the following:
- Provide assistance to Area Committee Secretary in drafting annual Area Committee report to USCG Office of Marine Environmental Response. **Deadline: May 2023.**
- Establish a Risk Assessment Workgroup to develop a risk assessment methodology. **Deadline: September 2023.**
- Hold a Worst Case Discharge workshop using the finalized risk assessment methodology to identify potential oil discharge scenarios and evaluate the likelihood, consequence and total risk for each. This process should be used to validate and update the Alaska Scenarios Compendium and prioritize Geographic Response Strategy Validation efforts. **Target: TBD**.

- Review ACP 2020.2, identify plan sections for validation, propose modifications, submit for Steering Committee approval, and begin draft of ACP 2020.3. **Deadline: June 2023.**
- Submit 2020.3 for OSC signature and USCG District 17 review. **Deadline: November 2023.**

Subcommittee Membership

- **Area Committee:** All participants in the Area Committee serve in an advisory role to the OSCs as representatives of their organizations.
- **Members:** Members must come from federal, state, local, tribal or territorial government agencies. The AWA AC Steering Committee shall appoint members, in writing, to serve on the Area Committee for their COTP Zone.
- **Participants:** Private sector and Non-Governmental Organization (NGO) representatives cannot be members of the committee, but rather serve as members at large. The Federal Advisory Committee Act prohibits industry representatives from holding Area Committee membership; however, industry participation in Area Committee meetings is invaluable.

Appendix E: Coastal ACP Architecture

Part	Section	Sub-Section	Title
Forward Documentation	**Approval Letter signed by District Commander**		
	Letter of Promulgation signed by the FOSC (AC Chair)		
	Record of Change Page		
1000 General & Administrative	**1100**	**Introduction**	
	1200	**Purpose of the ACP**	
		1210	List/Table of Annexes
	1300	**Area Committee Management and Administration**	
		1310	Area Committee Organization
		1320	Charter
		1330	AC Meetings
		1340	AC Annual Report
	1400	**ACP Validation and Testing**	
		1410	ACP Annual Update, Review, and Approval Process
		1420	GRS Validation (i.e., booming and collection strategies)
		1430	Area Exercises
	1500	**ACP relationship/alignment with other plans under National Response System (NRS)**	
		1510	Vessel Response Plans
		1520	Facility Response Plans
		1530	Local Plans
		1540	State Plans
		1550	Tribal Plans
		1560	Regional Contingency Plans
		1570	International Plans
	1600	**ACP Relationship to National Response Framework (NRF)**	
	1700	**ACP Relationship to the National Incident Management System (NIMS)**	
	1800	**ACP Relationship to other MTS Focused Response Plans Managed by the Coast Guard**	
2000 Geographic Scope & Jurisdictional Boundaries	**2100**	**Description of Coast Guard Coastal Zone/EPA Inland Zone Boundary (Line of Demarcation)**	
	2200	**Copy of current USCG/EPA MOU**	
	2300	**Geographic boundaries/coordinates (COTP Boundary)**	
	2400	**Graphic(s) depicting Geographic Area covered by ACP**	
	2500	**Sub-geographic areas, parish/county borders, as necessary**	
3000 Roles & Responsibilities	**3100**	**General Roles and Responsibilities**	
		3110	Responsible Party/Industry Plan Holder
		3120	Local Government
		3130	State Government
		3140	Tribal Government
		3150	Regional Response Team

Part	Section	Sub-Section	Title
3000 Roles & Responsibilities	3200	**Natural Resource Trustees**	
		3210	Local
		3220	State
		3230	Tribal
		3240	Federal
	3300	**Support Available to the FOSC**	
		3310	Federal Agency Scientific/Technical Support
		3320	Nongovernmental Organization Technical Support
4000 Pre-Spill Risk Analyses, Consultations & Response Strategies	4100	**Worst Case Planning Scenarios**	
	4200	**Pre-Spill ESA Consultations**	
		4210	Preauthorization and BMPs
		4220	Threatened and Endangered Species within AOR
	4300	**National Historical Preservation Act**	
		4310	Preauthorization and BMPs
	4400	**Environmentally Sensitive Areas**	
	4500	**Economically Sensitive Areas**	
	4600	**Geographic Response Strategies**	
5000 Response	5100	**Initial Reporting, Notification, and Preliminary Assessment Procedures**	
		5110	Preliminary Assessments
		5120	Cleanup Assessment Protocol
	5200	**Emergency Consultations**	
		5210	ESA
		5220	Section 106
	5300	**General Hierarchy of Response Priorities**	
		5310	Safety
		5320	Priority Identification and Protection Strategies
		5330	Risk Assessment for Sensitive Area Prioritization
		5340	Environmentally Sensitive Areas
		5350	Wildlife Rescue & Recovery
		5360	Aligning of NRDA with Response
	5400	**National Incident Management System (NIMS)**	
		5410	Unified Command (UC)
		5420	FOSC Decision Authority
		5430	Responsible Party
		5440	Common Operating Picture (COP)
		5450	Incident Command Post (ICP)
		5460	Public Information

Part	Section	Sub-Section	Title
5000 Response	**5500**	**Oil Spill Containment and Cleanup**	
		5510	Containment
		5520	Shoreline Protection Options
		5530	On-water Recovery
		5540	Non-floating Oil Recovery and Protection
		5550	Shore-side Recovery and Natural Collection Points
		5560	Shoreline Cleanup
		5570	Decontamination
		5580	Waste Management and Disposal
		5590	Terminating Cleanup Operations
		5595	Non-Standard / Unconventional Emergency Removal Action Scenarios
	5600	**Oil Spill Response Funding and Cost Recovery**	
		5610	FOSC Access to OSTLF
		5620	Funding Authorizations for Other Agencies (MIPRs, PRFAs, WAFs)
		5630	Trustee Agency Access to the OSLTF
	5700	**Hazardous Substance Spill Response**	
		5710	Introduction
		5720	Environmental Support to the FOSC
		5730	State Policy
	5800	**Hazardous Substance Spill Response Funding and Cost Recovery**	
		5810	FOSC Access to CERCLA funding
		5820	Funding Authorizations for Other Agencies (MIPRs, PRFAs, WAFs)
		5830	Trustee Agency Access to CERCLA
	5900	**Response Documentation Requirements**	
		5910	Incident Action Plans
		5920	Consultation Documentation and other Decision Memos
		5930	Cost Recovery Documentation and Claims
	5950	**Post-Spill Consultation**	
6000 Response Resources	**6100**	**Oil Spill Removal Organizations (OSROs) and Equipment**	
		6110	OSRO Classification Program
		6120	Response Resource Inventory (RRI) Database
		6130	Classified OSRO listings for the Area/COTP Zone
		6140	Oil Spill Response Cooperatives and Consortiums
	6200	**Hazardous Substances Response Resources**	
	6300	**Salvage and Marine Firefighting Resources**	
7000 Response Technologies	**7100**	**Response Technologies for Oil Spill Response**	
		7110	Dispersant Use
		7120	NCP Product Schedule
		7130	Special Monitoring of Dispersants (SMART Protocols)
		7140	In-Situ Burning (ISB)
		7150	Special Monitoring of ISB (SMART Protocols)
		7160	Surface Washing Agents
		7170	Special Considerations for Non-Standard Emergency Removal Action Scenarios
		7180	Alternative Response Tool Evaluation System (ARTES)
	7200	**Response Technologies for Hazardous Substance Spill Response**	

Annexes

STANDARD ANNEXES		
ANNEX A	**Master Hyperlink Index**	Mandatory; Supports base plan and all Annexes
ANNEX B	**Risk Analyses/Risk Profile Annex**	Mandatory; Not for public consumption
ANNEX C	**Fish & Wildlife Annex**	Mandatory
ANNEX D	**Hazardous Substances Annex**	Mandatory
ANNEX E	**Salvage and Marine Fire Fighting Annex**	Mandatory
ANNEX F	**Response Tools: Quick response guides (QRGs), checklists, forms, job aids, etc.**	Mandatory
ANNEX G	**Voluntary Organizations Active in Disaster (VOAD)**	Mandatory
ANNEX H	**ESF-10 Annex**	Mandatory if applicable
ANNEX I	**Ice Operations & Arctic/Cold Weather Response**	Mandatory If applicable
ANNEX J	**Space Operations**	Mandatory if applicable
ANNEX K	**Air Operations & UAV Support**	Supplemental if needed
ANNEX L	**Unconventional Oil Response**	Supplements unconventional response content in base plan as needed
ANNEX M	**Tribal Annex**	Supplements tribal content in base plan as needed
ANNEX N	**Swift Water Response Operations**	Supplements swift water content in base plan as needed
ANNEX O	**International Coordination and Relationship to International Plans**	Supplements international content in base plan as needed

NON-STANDARD ANNEXES		
ANNEX AA	**Reserved for unique, area-centric Annex**	
ANNEX BB	**Reserved for unique, area-centric Annex**	
ANNEX CC	**Reserved for unique, area-centric Annex**	

Appendix F: ACP Formatting Job Aid

Currently in development.

This section will be completed for version two of the handbook.

Appendix G: Exercise Project Management & Methodology

EXERCISE TYPE	Seminar	Workshop	Table-Top Exercise	Drill	Functional Exercise	Full-Scale Exercise
Complexity	Discussion-based	Discussion-based	Discussion-based	Operations-based	Operations-based	Operations-based
	CRAWL		WALK		RUN	
Description	**Knowledge Focus** Overview of PPP*, protocols, resources, concepts, & ideas. * Plans, policies, procedures	**Development Focus** Develop, review, or update/revise PPP.	**Validation of PPP** Discuss response to a scenario to generate dialogue of issues & develop conceptual understanding.	**Testing Tools/Process** Orients players to authorities, PPP, protocols, resources, concepts, & ideas.	**Application of PPP** Designed to test & evaluate capabilities & functions in a realistic, real-time environment.	**Operational Validation** Most complex; multiple agencies & jurisdictions; & includes real-time deployment of resources.
Purpose	• Establishes common framework • Starting point for plan development or revisions	• Player discussion • Specific focus • May develop products or job aids	• Comprehension of PPP • ID strengths & areas for improvement	• Validate functions, capabilities, & procedures • Training on tools & equipment • Practice skills	• Test PPP • Exercise staff in crisis management • Provide command direction & control functions	• Operating under a Unified Command • Interagency cooperation • Analyze PPP developed during prior exercises
Structure	• Lecture-based (e.g., presentations, case-studies, panels) • Limited opportunity for feedback	• Facilitator led • Lectures and/or use of decision support tools • Facilitated breakout sessions	• Scenario timeline • Respond to various problems presented • Problems discussed & resolved as group	• Test clearly defined plans, procedures, & protocols • Limited focus • Conducted alone or as a series of drills	• Realistic exercise scenario w/event updates to drive player action • IMT focus • Objectives test PPP	• Complex scenario w/operational focus • Multi-agency response • Focus on operational strategies/tactics & resource management
Goals / Outcomes	• Awareness of capabilities • Set objectives for future exercises • AAR captures discussion & issues	• Develop consensus • Collect/share info • Develop AAR/LL	• Enhance awareness • Understand roles • Validate PPP • Develop AAR/LL	• Evaluate/validate PPP & equipment • Reinforce best practices • Validate trng needs • Develop AAR/LL	• Validate/evaluate capabilities • Validate PPP • Strengthen IMT cooperation • Develop AAR/LL	• Demonstrate roles/ responsibilities • Build relationships • Evaluate strategies & resource requirements • Develop AAR/LL
Timelines	Length: 4hrs-1 day Planning: 3-6 month	Length: 1-2 days Planning: 3-6 month	Length: 4hrs Planning: 4-8 month	Length: 4-8hrs Planning: 3 month	Length: 1-3 days Planning: 8-12 month	Length: 3-14 days Planning: 9-18 month

Figure 5: Per Emergency Management Manual, Volume III – Exercises; COMDTINST 3010.13(series)

Appendix H: AAR /Lessons Learned Summary Matrix

Maintaining an AAR / Lessons Learned Summary Matrix is a recommended best practice. While the USCG Contingency Preparedness System (CPS) provides a repository for AARs/LL, it does not currently have a means of providing a quick, easy-to-reference snapshot of major LL. Below is an example AAR/LL Summary Matrix developed by District 5 for Mass Rescue Operations Lessons Learned; something similar could be developed for oil/hazsub for inclusion in Annex B, *Risk Analysis Annex.*

Event / Date / Location	Brief Description	Major Lessons Learned
M/V CARIBBEAN FANTASY *2016, Sector San Juan*	Fire/Grounding outside of San Juan Harbor, 511 rescued	• Use of Passenger Vessel Safety Specialist. • Immediate recall of all Sector personnel. • Designation of On-Scene Coordinator (surface & air). • Use of CART to "feed the beast" to D7, LANT, NCC. • Surge staff for info flow in Command Center. • AIRSTA Borinquen Mass Rescue Life Rafts. • Insufficient interagency communications. • Accountability was a challenge: ➢ Conflicting # POB (SANS/ANOA vs. Master). ➢ Lack of standard process at landing site & reception center. • Requested resource/personnel needs during initial CIC call. • Address public affairs early & often (social media). ➢ Consider use of special liaisons for niche issues.
EMPRESS OF THE NORTH *2007, Sector Juneau*	Grounding near Rocky Island, damage caused listing/flooding, 282 rescued	• Immediate augmentation of command center staff. • City had a Cruise Ship Shoreside Response Plan. • Accountability was a challenge: ➢ Conflicting passenger manifests. ➢ GOODSAMs were key but had no accountability process. • Quick designation of an On-Scene Coordinator. • Difficult to meet CIC timeframes to pass information. • All communications were on channel 16 (difficult to coordinate). • UC process was not well established. • JIC was never stood up and Command Center was inundated.

Event / Date / Location	Brief Description	Major Lessons Learned
US Airways 1549 *2009, Sector New York*	Bird strike to engine, emergency landing on the Hudson River, 155 rescued	• Accountability was a challenge: ➢ Sector CC directed SRUs to take survivors to Chelsea Piers (confusion between NJ or NY piers). Need to pre-ID sites. ➢ Sector CC did not have a phone number for the FAA to get passenger/crew numbers. • JIC should have been established early on in the response. • Command Center was quickly overwhelmed with calls but quick transition to an IMT was seamless. • UC lacked organization, needed an interagency operations center. • Use of Homeport AWS allowed timely notification to port partners.
M/V ESCAPADE *2014, Sector Charleston*	Hard aground off Tybee Island GA, 116 rescued, 7 remained & refloated vessel	• Quick designation of On-Scene Coordinator to serve as comms link between on-scene vessels and the Command Center. • Quick engagement with Public Affairs Detachment (PADET) was vital. • Quick initiation of the ICS construct.
Alaska Air 261 *1999, Group Los Angeles*	High speed crash into Pacific Ocean, all 88 onboard died	• Quick designation of On-Scene Coordinator. • Shifted other SAR calls to adjacent USCG units. • Growing pains with ICS (especially with Unified Command). • District/Area provided Public Affairs support & AIRSTA provided an Air Ops Branch Chief. • Need to pre-identify ICP facilities and staging areas. • Use of NGOs (Red Cross / Salvation Army) was key. • CISM/Chaplains were mobilized early on and used throughout. • VIP interest was significant and need to plan for VIP visits. • Victim Family Liaison was sent to the hotel as link to families. • JIC needs to be established quickly and staffed.

Table 3: AAR/Lessons Learned Summary Matrix

Appendix I: CGNRP Precepts

Provided below are the CGNRP precepts for each cycle and the general recommendations provided by the panel.

A. 1st Cycle, 2018-2023

Worst Case Discharge (WCD) Scenarios: A WCD identification and tracking matrix should be developed and incorporated into the ACP. The matrix should properly inventory all WCD scenarios of concern within the Area of Responsibility (AOR). Such an inventory serves as a fundamental survey of risks from all potential sources that could significantly impact federal waterways within the coastal zone. Such a matrix should denote the presence or absence of specific WCD planning scenarios. Note that it is not necessary to address all conceivable WCD scenarios in the ACP; but rather, the ACP should identify unique WCD scenarios that address significant geographic variability that may exist within an area and the distinctive risks they may pose. When determining these distinct geographic response areas, consideration should be made to the uniqueness of individual response communities, operational environments, spilled product characteristics, and unique political, economic, and environmental sensitivities. The panel recommended that, if not already done, the Area Committees establish a risk analysis sub-committee or workgroup to assess and monitor the area's risk landscape to help ensure that planning efforts and the associated ACP are commensurate with current risks and identified WCDs. This basic risk analysis should serve as a cornerstone of the ACP and help guide planning efforts.

Endangered Species Act (ESA) Section 7 Compliance: The panel recognized the need for clarity in how ACPs address Endangered Species Act (ESA) Section 7 consultation requirements. To meet those requirements, the FOSC may use the emergency consultation process described in the ESA regulations. Note that if Pre-Spill consultations have already been conducted with the Services on specific response actions (and a formal Biological Opinion or Letter of Concurrence has been secured from the Services), consult the appropriate Services documents regarding the need for emergency consultation. The CGNRP recommended development of a 1-2 page Quick Response Guide (QRG) for incorporation into the ACP. This QRG should provide the Federal On-Scene Coordinator (FOSC) and responders basic familiarity with the overall emergency consultation process and contacts for initiating the emergency consultation in a time-sensitive response environment. The FOSC is required to consult with the USFWS and the National Marine Fisheries Service. The DOI representative and NOAA Scientific Support Coordinator can help facilitate contact with the Services. The CGNRP recommended using the National Response Team's (NRT) ESA Section 7 Emergency Consultation form on NRT.org or other similar forms developed by respective RRTs.

National Historic Preservation Act (NHPA) Section 106 Compliance: While it is appropriate to discuss FOSC responsibilities for ensuring Section 106 compliance during a response, the CGNRP recommended consolidating this information into the 1-2 page QRG described in the ESA Compliance section just above.

Status of Geographic Response Strategies: The CGNRP strongly recommended that the Area Committee develop a GRS validation strategy. This validation strategy should be commensurate with risks and uncertainties as determined by the Area Committee. Validation levels are scalar in nature and should be discussed among subject matter experts within the Area Committee. If not already in place, it is highly recommended that a standing GRS sub-committee or workgroup be established to facilitate this process. This sub-committee can assist the FOSC in meeting their obligation to validate all GRSs within the AOR. The GRS validation status and strategy should be addressed in the ACP.

Overall usability of the ACP: Evaluated ACP organization and general usability of the plan.

B. 2nd Cycle, 2023-2027

Implementation/completion of previous CGNRP recommendations: Reviewed implementation of previous CGNRP Pass-back memo recommendations.

Salvage and marine firefighting (SMFF): The CGNRP identified the need to improve Marine Firefighting (MFF) plan content and suitability. Recommended consulting Sector Jacksonville's MFF plan as an example. CG-MER is currently developing a standard architecture for future MFF plan revisions. There is also a need to ensure that all links to the Salvage Response Plan are up-to-date and connect to the most recent version.

Hazardous substances (HAZSUB): The CGNRP strongly recommended engagement with Local Emergency Planning Committees (LEPCs), or an appropriate alternative, to identify hazardous substance planning scenarios for inclusion in the WCD table (base plan). The panel also identified the need to increase specificity/granularity in the WCD table with respect to product types and scenarios.

Risk analysis/assessment documentation: The CGNRP noted that higher risk/consequence planning scenarios should be identified and addressed in the ACP and Risk Analysis Annex.

Potential places of refuge: The CGNRP noted that Potential Places of Refuge (PPOR) descriptions need to be added to ACP Section 4000. At a minimum, the NRT Places of Refuge guidance document should be incorporated into the section via reference, if there are no area-specific PPOR locations or decision-making processes identified.

Overall usability of the ACP: Ensure all links and document references are up-to-date and connect to the most recent version of document. It is critical to ensure that the ACP is readily available for public access (aside from any security sensitive components).

Appendix J: Example Information Management Plan

Here is an example Information Management Plan that uses Microsoft 365 as the primary cloud-based tool for creating, managing, storing, and securing relevant area committee documents.

1. Introduction
   - Purpose: To establish guidelines for managing, storing, and securing information across the organization using Microsoft 365.
   - Scope: Applies to all departments and users within the organization.
2. Information Governance
   - Data Classification: Implement data classification labels (e.g., Confidential, Internal, Public) using Microsoft 365 Compliance Center.
   - Retention Policies: Set retention labels to automatically delete or archive data based on regulatory requirements using Microsoft Information Governance.
3. Document Management
   - Storage and Collaboration: Use SharePoint and OneDrive for centralized document storage, enabling version control and real-time collaboration.
   - Access Controls: Configure access permissions in SharePoint and OneDrive based on user roles, ensuring only authorized personnel can access sensitive information.
4. Communication and Collaboration
   - Teams: Utilize Microsoft Teams for project-based collaboration, integrating with SharePoint and OneDrive for document sharing.
   - Email Management: Use Outlook for email communication, with retention policies applied to specific folders or mailboxes.
5. Data Security
   - Multi-Factor Authentication (MFA): Enforce MFA across all Microsoft 365 accounts to enhance security.
   - Data Loss Prevention (DLP): Implement DLP policies using Microsoft 365 to prevent sensitive information from being shared externally.
6. Compliance and Auditing
   - Compliance Center: Regularly monitor compliance status and audit logs using Microsoft 365 Compliance Center.
   - Legal Hold: Use eDiscovery to place legal holds on content during investigations or litigation.
7. Training and Support

- User Training: Conduct regular training sessions on using Microsoft 365 tools effectively and securely.
- Help Desk Support: Provide a dedicated help desk for resolving Microsoft 365-related issues.

8. Review and Update
    - Regular Reviews: Periodically review and update the Information Management Plan to align with new regulations or organizational changes.
    - Continuous Improvement: Gather feedback from users and stakeholders to improve the plan and Microsoft 365 implementation.

This plan ensures that the organization effectively manages its information assets using Microsoft 365 while maintaining compliance, security, and efficiency.

Appendix K: ACP Environmental Tradeoff Analysis

The NCP does not require the use of any specific methodology to identify protective strategies that may minimize the potential environmental impact of hazardous substance releases or oil discharges. However, some contingency planners have used Net Environmental Benefit Analysis (NEBA)—a methodology for identifying and comparing environmental tradeoffs of alternative management options in the removal of discharged oil or released hazardous substances—to address this goal. Environmental tradeoffs are often characterized as the contrast between avoided loss of environmental or ecological services attained by using a given removal technique (or combinations of various removal techniques) with the potential environmental harm that another removal technique (or combination thereof) may cause. When developing ACPs, RRTs and Area Committees should use the best available scientific information to assess environmental tradeoffs. An environmental tradeoff analysis for oiled sites typically involves the comparison of the following management alternatives:

- Leaving contamination in place for natural attenuation;
- Removing the contaminants through traditional removal techniques (e.g., mechanical recovery);
- Remediating contamination with alternative removal techniques; and
- A combination of the above.

This analysis involves agency personnel with environmental responsibilities that include evaluating environmental or ecological services (e.g., natural resource trustees), assessing adverse impacts, and evaluating removal actions. In addition, this type of tradeoff analysis may be applied to environmental management options. To do this, a balance of resource managers and emergency responders from federal, state, and local agencies would coordinate in forming opinions, guiding discussions, and educating each other in processes of importance and concern.

Each resource manager and emergency responder is responsible for implementing their statutory obligations and thus weighing the value of natural resources in a manner that reflects the agency's mission. It is important to note that while environmental tradeoff analyses may be useful in informing the selection of response options, some response options (e.g., chemical countermeasures) have applicable statutory and regulatory requirements that must be considered and take precedence over any analysis results.

An environmental tradeoff analysis can assist resource managers with a wide array of information, including the possibility that selected removal alternatives may provide marginal or no environmental benefit relative to natural attenuation of contaminants and ecological recovery. This scenario may occur because:

- The removal action is ineffective or inappropriate (the action does not substantially change the risk);
- The removal alternative causes environmental injuries greater than the damage associated with the contamination, the ecological injury from contamination has been overestimated, or injuries associated with removal were not properly addressed; or
- The removal alternative provides an environmental advantage to one environmental compartment but causes unacceptable injuries to another.

The following websites offer a mixture of protocols, guidelines, research findings, and practical examples of Net Environmental Benefit Analysis, providing a solid foundation for understanding and applying the concept in various environmental contexts.

- NOAA offers comprehensive resources on environmental assessments and response strategies, including NEBA. Their website includes detailed guidelines and case studies relevant to oil spill responses and other environmental interventions.
  - https://response.restoration.noaa.gov
- EPA provides resources on environmental impact assessments that can be applied in NEBA. Although it might not specifically mention NEBA, EPA's resources on environmental evaluations are closely related and valuable.
  - https://www.epa.gov/nepa/national-environmental-policy-act-review-process
- IPIECA (International Petroleum Industry Environmental Conservation Association) develops and shares good practices and solutions across the oil and gas industry, including NEBA procedures for oil spill response.
  - https://www.ipieca.org/work/marine-spill-preparedness-and-response/marine-spill-response-resources
- IOSC (International Oil Spill Conference) provides access to a wealth of papers, presentations, and proceedings from conferences that cover the latest developments and methodologies in oil spill response, including NEBA.
  - https://meridian.allenpress.com/iosc
- Cedre (Centre of Documentation, Research and Experimentation on Accidental Water Pollution) is a French organization that offers detailed protocols and case studies on NEBA, particularly focusing on maritime and freshwater environments.
  - https://wwz.cedre.fr/en/