

## Regional Response Team (RRT) Annual Report

<b>Region:</b>	<b>Alaska</b>	<b>Calendar Year:</b>	<b>2016</b>
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### A. Annual Meetings

	Dates	Location	# of Attendees	Website for presentations
1.	Jan 2016	Anchorage, AK	58	<a href="http://alaskarrt.org/">http://alaskarrt.org/</a>
2.	May 2016	Kodiak, AK	19	<a href="http://alaskarrt.org/">http://alaskarrt.org/</a>
3.	Sep 2016	Nome, AK	28	<a href="http://alaskarrt.org/">http://alaskarrt.org/</a>

### B. Activations / Notifications

1.	<b>Dates:</b>	None	<b>Event:</b>	None	<b>ACT</b>	<b>NOT</b>	<b>X</b>
	<b>Issue / Concern:</b>	None occurred					
	<b>Agencies Involved:</b>						
	<b>Decisions Made:</b>						

### C. RRT Exercises

1.	<b>Dates:</b>	October 2016	<b>Event:</b>	ExxonMobil Point Thompson ISB Drill			
	<b>Agencies Involved:</b>	USEPA, USCG, ADEC, USDOJ, USFWS, AKDNR					
	<b>Summary of exercise:</b>	ARRT conducted a two day full scale IMT exercise, in Anchorage, AK. The scenario was rupture of a pipeline carrying natural gas condensate, spilling to inland waters, and pooling in an inland pond. The exercise was designed to optimize use of ISB for response. As part of the exercise, the ARRT conducted an incident specific activation to approve the use of accelerant chemical for ISB. The EPA served as FOSC, with USCG providing Deputy OSC. The EPA's Alaska planner/ARRT Coordinator served as FOSCR, in the absence of the pre-designated FOSC. The exercise was a successful test of backup ARRT activation protocols.					
	<b>Dates:</b>	October 2016	<b>Event:</b>	Annual <i>Taps Tanker</i> Exercise in Prince William Sound			
	<b>Agencies Involved:</b>	DOI-USFWS, NOAA Scientific Support Coordinator and NMFS					

**Summary of exercise:**

Annual Taps Tanker Exercise in Prince William Sound: While not an ARRT specific exercise with specified ARRT objectives, ARRT agency representatives did participate as part of their agency statutory requirements. Tesoro Alaska Company hosted the annual exercise in Oct, 2016. The scenario was designed to exercise response efforts for a smaller, more realistic event resulting from a notional failure of a tank vessel manifold while loading product at the Valdez Marine Terminal (VMT). The design team targeted four primary focus areas: marine transportation, public information and liaison officer communications regarding west coast supply impacts, VMT storage, and response equipment decisions. There were over 200 total participants. Involved RRT agency representatives, including DOI-USFWS, the NOAA Scientific Support Coordinator, and NMFS, contributed to designing the exercise objectives, developing scenario injects, and evaluating the exercise. While the event did not include RRT activation, agency participants provided invaluable support to the FOSC, including regulatory guidance, assistance with endangered species compliance, and best management practices for operational tactics.

**D. Changes in RRT Leadership**

Agency	Outgoing Personnel	Incoming personnel
1) USCG	Cecil D. McNutt, JR USCG ARRT Coordinator	TBD
2)		
3)		

**E. Best Practices and Lessons Learned by the RRT (which may help other RRTs)**

None.

**F. Federal State, and Local Planning and Coordination Efforts**

The Unified Plan Update Committee: Review of UP Annex B Regional Stakeholder Committee revision was extended to May 29, 2016.

- Annex D: Unified Plan Review and Update Process completed.
- Review of UP Annex B Regional Stakeholder Committee revision is completed and out for public comment until May 29, 2016\*.
- Next planned update is Annex B (area command section).

*\*Following the public comment period, the Executive Steering Committee decided to scrap the Regional stakeholder committee revision.*

Area Planning Task Force: At January 2016 ARRT meeting, the state of Alaska submitted a proposal to consider adoption of a planning system similar to that used in the rest of the country. The Area Planning Task Force was established to address this proposal. The task force recommended maintaining the 10 subareas, and establishing four Area Contingency Plans (ACPS) for Southeast Alaska, Prince William Sound, Western Alaska and Arctic. The four plan boundaries represent a hybrid of the three USCG Caption of the Port Zones and the three ADEC regions. The following deadlines were established:

- June 1, 2016 – Solicit stakeholder input for draft boundaries, ACP conceptual model, and timeline for transition.
- September 15, 2016 – Complete framework design and begin compiling Subarea Contingency Plan and Unified Plan sections to create a Regional Contingency Plan (RCP) and ACPs. Begin State Regulatory amendment process.
- November 15, 2016 – Solicit comments from tribes, the ARRT, State Emergency Response Committee and the public for draft RCP/ACPs.
- March 1, 2017 – Promulgate RCP/ACPs. Area Committees assume responsibility to update plans

*\*As of September 28, 2016, the Area Planning proposal is still in the conceptual stage with target dates suspended.*

Food Safety Task Force Update: Working on an appropriate structure and members list.

ARRT Cultural Resources Committee: Met with the State Historic Preservation Office regarding the need to reconstitute the committee and held meetings with On-Scene Coordinators and that the roster of qualified cultural resources experts needs to be expanded.

ARRT Wildlife Protection Committee: The committee will be looking at the need to update the Alaska Wildlife Protection Guidelines in the Unified Plan.

Science and Technology Committee (STC): Polled OSCs to determine science topics that need to be addressed by STC. The following topics were priorities:

- Assist the OSCs in preparing guidance to assist in determining dispersant avoidance areas;
- Develop a framework to aid in analyzing environmental trade-offs;
- Advising the Federal OSCs (FOSCs) on incorporating recommendations and requirements specified in the ESA biological opinions.

Dispersant Working Group Update: Dispersant plan is completed and signed on January 27, 2016 which now gives the subarea plans 24 months to identify dispersant use avoidance areas within the preauthorization zone for each subarea. Industry must comply within 24 months upon completion of subarea plans.

Endangered Species Act Compliance Task Force: Working to develop an environmental compliance annex to the Unified Plan in the fall of 2016.

**G. Challenges and Issues ( and Operational Requirements Which May Require NRT Attention)**

None

Enclosure 1: ESA Compliance Report



Alaska Regional Response Team  
CY 2016  
ESA Compliance Report

JUNE 6, 2017

## Background

On January 23, 2014, the U.S. Environmental Protection Agency (EPA) and the U.S. Coast Guard (USCG)<sup>1</sup> – pursuant to the requirements of the Endangered Species Act – jointly issued the *Biological Assessment of the Alaska Federal/State Preparedness Plan for Response to Oil & Hazardous Substance Discharges/Releases (Unified Plan)*. In response, the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) issued Biological Opinions (BiOp) on the Alaska Unified Plan on February 27, 2015, and May 15, 2015, respectively. These BiOps contain certain mandates and recommendations for the EPA and USCG regarding oil pollution preparedness, planning, and response actions. Among those requirements is annual<sup>2</sup> reporting back to the Services on steps taken as the responsible federal action agencies toward achieving those mandates and recommendations.

The first annual reporting to the Services was summarized in Section III of the *ARRT Annual Report 2015*<sup>3</sup> (issued January 20, 2016). This year's report is a more detailed accounting of compliance measures and means taken by the ARRT and the federal on-scene coordinators (FOSC) with direct reference to the FWS BiOp Conservation Recommendations and the NMFS BiOp Reasonable and Prudent Measures (RPMs), including Terms and Conditions, and Conservation Recommendations.

## Organization

To describe action agency compliance progress made at both the local FOSC level and the regional ARRT level, the below Compliance Update section is separated by Service, then by each Services' respective Conservation Recommendations and RPMs along with any Terms and Conditions (attached for reference). These have been restated as prompts to facilitate gathering of content. Where applicable, each FOSC's compliance efforts (within their respective areas of responsibility) are detailed therein in response to those questions. Relevant ARRT inputs addressing regional matters are included at the end of each section.

## Point of Contact

Please contact Mark Everett, USCG Co-Chair of the Alaska RRT, [Mark.Everett@uscg.mil](mailto:Mark.Everett@uscg.mil), (907) 463-2804, with any questions.

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<sup>1</sup> The Endangered Species Act places the burden of compliance on the federal agencies taking the action which may affect protected species or their critical habitat, etc. Under the National Contingency Plan (40 CFR 300), the U.S. Environmental Protection Agency and the U.S. Coast Guard are the lead federal (action) agencies for pollution preparedness and response. However, this work is planned and performed in conjunction with other federal agencies, the States, and tribes, including agencies representing the Services in the on the Alaska RRT. Therefore, this report is designated as from the Alaska RRT.

<sup>2</sup> Calendar year based to coincide with the ARRT Annual Report.

<sup>3</sup> The ARRT Annual Report to the NRT is based on calendar year.

# Compliance Update

USFWS BiOp (pages 121-123), see attached

## 8.o Conservation Recommendations

1. What has been done to increase FWS awareness of and meaningful involvement in responses to oil spills?

<p>USCG Western Alaska Captain of the Port (FOSC) (Sector Anchorage)</p>	<p>For every case, the duty federal on-scene coordinator representative (FOSCR) and pollution responder (PR) contact DOI and provide initial and subsequent updates. DOI works to liaison between the FWS and the FOSCR to pass along case details and any of FWS concerns. Throughout 2016, the USFWS was routinely on update emails sent out to state and federal partners for awareness, and their responses to case updates were carefully reviewed by duty personnel and addressed as appropriate.</p> <p>Additionally, Sector Incident Management Division (IMD) coordinated and attended training with the Scientific Support Coordinator on the ESA section 7 emergency consultation procedures, including an overview of the NMFS and FWS biological opinions. Sector is also working with NMFS and USFWS to revise the ESA Initiation forms and develop a template for closing out Emergency ESA Section 7 Consultations, to be used throughout District 17.</p>
<p>USCG Prince William Sound Captain of the Port (FOSC) (Marine Safety Unit Valdez)</p>	<ul style="list-style-type: none"> <li>- The FOSC for Prince William Sound has increased outreach to the FWS for drills and exercises to encourage participation and involvement in Industry sponsored events. Most notably the FWS took a significant role during an Alyeska Wildlife Recovery Drill in October 2016. They provided expectations and training while participating in the drill in Valdez.</li> </ul>
<ul style="list-style-type: none"> <li>- USCG South East Alaska Captain of the Port (FOSC)</li> <li>- (Sector Juneau)</li> </ul>	<p>To ensure awareness of USCG oil spill response-related activities, US Fish and Wildlife Service (USFWS) personnel receive all the Southeast Alaska National Response Center (NRC) reports. Additionally, whenever Sector Juneau pollution responders receive notification of a discharge, they contact Department of the Interior (DOI) employees (mandatory primary POC) (and often contact USFWS or National Park Service (NPS) staff secondarily) and National Oceanic and Atmospheric Administration (NOAA) representatives, to inform them of the discharge (location,</p>

	<p>size, type of product, etc.). Sector Juneau pollution responders may also use this call to seek technical assistance prior to initiating either an informal or formal consultation. Based on the nature of a particular discharge, DOI and NOAA personnel advise USCG responders on whether listed species and/or designated critical habitats are likely to be impacted. If an informal or formal consultation is warranted, the responder then completes the “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form, in concert with the appropriate trustee agency representative(s).</p> <p>Additionally, USCG and DOI employees (representing USFWS equities) attend three/year Alaska Regional Response Team meetings, an interagency pollution preparedness and response forum.</p>
USEPA Region 10	When participating in spill preparedness activities, Alaska-based On-Scene Coordinators and the Alaska Spill Response Planner invited the USFWS Environmental Contaminants/Spill Response Coordinator, Dr. Lori Verbrugge, to participate in those drills and exercises.
Alaska RRT	The relatively small yet tight knit cadre of representatives from action agencies, the Services, and other allied and industry professionals involved in the pollution preparedness and response enterprise in Alaska work well together through existing relationships and established processes. Much of this occurs through regular meetings, exercises and responses. Occasionally new opportunities arise, especially in such a dynamic policy and operations theater, for greater ongoing cross-agency training and orientation. The ARRT routinely encourages its member agencies and subarea committees to identify and pursue, as resources allow, greater collaboration to gain a deeper understanding and insight into their partners’ policies, procedures, and capabilities.

2. Summarize your FY2016 spill response activities to include:

a. Name/Type of cases involving emergency consultation with FWS

USCG Western Alaska Captain of the Port (FOSC)	<p>Sector Anchorage conducted the following emergency consultations:</p> <p>On 23 July, 2016, the F/V AMBITION suffered a breach to the lazarette and began taking on water in the vicinity of False</p>
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	<p>Pass, AK with a potential of 3000 gallons of diesel onboard. The vessel was abandoned and subsequently sank. An emergency ESA Section 7 Consultation was initiated and completed on 23 July.</p> <p>On 26 July, 2016, the F/V ALASKA JURIS was reported sinking and abandoned with a potential of 100,000 gallons of fuel onboard. An Emergency ESA Section 7 Consultation was initiated and completed on 29 July.</p> <p>Marine Safety Detachment (MSD) Kodiak and MSD Dutch Harbor did not conduct any ESA Section 7 Consultations in 2016.</p>
USCG Prince William Sound Captain of the Port (FOSC)	No consultations performed. Notifications only.
USCG South East Alaska Captain of the Port (FOSC)	<p>For the majority of Sector Juneau’s CY2016 cases, communications between USCG and USFWS remained at the “technical assistance” level. The size and scope of most of the oil discharge incidents (and corresponding responses) were not anticipated to adversely impact USFWS ESA listed species and/or critical habitat.</p> <p>Sector Juneau did conduct informal consultations on three cases during 2016, involving F/V YANKEE, M/V BIG RED, and M/V CHALLENGER. However, in those cases, USCG was advised that the resources subject to potential harm fell under the purview of NOAA’s National Marine Fisheries Service (NMFS). As such, USFWS was not involved in those informal consultations. Those consultations will be discussed in the NMFS section of this report.</p>
USEPA Region 10	No spill responses were conducted in 2016.
Alaska RRT	The ARRT received formal FOSC notifications and updates of several cases mentioned above, most notably the F/V ALASKA JURIS and M/V CHALLENGER. The ARRT monitored progress of the responses to, in part, ensure compliance with FWS Conservation Recommendations, but there were no Incident Specific activations of the ARRT, requests for support, nor ESA consultations at the regional level.

b. When impacts to listed species and critical habitat were avoided or not

<ul style="list-style-type: none"> <li>- USCG Western Alaska Captain of the Port (FOSC)</li> </ul>	<ul style="list-style-type: none"> <li>- During both cases in Section 2.a., responders adhered to recommended mitigation measures, and no known impacts to listed species or their critical habitat occurred.</li> </ul>
<ul style="list-style-type: none"> <li>- USCG Prince William Sound Captain of the Port (FOSC)</li> </ul>	<ul style="list-style-type: none"> <li>- N/A</li> </ul>
<ul style="list-style-type: none"> <li>- USCG South East Alaska Captain of the Port (FOSC)</li> </ul>	<ul style="list-style-type: none"> <li>- N/A</li> </ul>
<p>USEPA Region 10</p>	<p>N/A</p>
<p>Alaska RRT</p>	<p>The ARRT has asked all FOSCs to include in their regular briefings to the ARRT (required at least annually but usually given thrice annually) content specifically related to impacts of responses to listed species and critical habitat. This affords the action agencies and the Services' ARRT representatives both a summary of activities at the local responder level and an opportunity to seek additional information in follow-up questions during ARRT meetings. The ARRT meeting agenda format has also been amended to include a regular report-out on ESA related subject matter such as progress on compliance efforts, national level working groups (NRT), etc.</p>

c. Evaluation of effectiveness of emergency consultation processes with FWS and any improvements made to procedures

<p>USCG Western Alaska Captain of the Port (FOSC)</p>	<p>The below lessons learned were addressed in the Section 7 Consultation Closeouts for the above cases and were forwarded to USFWS and NMFS:</p> <ol style="list-style-type: none"> <li>1. The consultation should be conducted as early as possible in the response to allow responders to prepare for recommended mitigation measures before arriving on-scene.</li> <li>2. It could be beneficial to include a member of the Environmental Unit representing the FOSC in the incident management team</li> </ol>
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	<p>(IMT). This would allow a single point of contact to relay consultation recommendations to the Operations Section and personnel on-scene.</p> <p>3. Keeping IMT personnel updated on forthcoming mitigation recommendations would allow the Operations Section to adequately prepare, and reflect associated tasking on form ICS-204s for formal direction and documentation.</p> <p>With regards to documenting wildlife encounters, information such as observation distance, vessel speed, and overflight heights should be collected from designated observers.</p>
USCG Prince William Sound Captain of the Port (FOSC)	No Consultations performed. Notifications only.
USCG South East Alaska Captain of the Port (FOSC)	N/A
USEPA Region 10	N/A
Alaska RRT	<p>See response to 2.c. above and note the improvements described by the FOsCs in the development of a standardized ESA Consultation Closeout form for the region. The ARRT will consider adding this new form to Alaska Unified Plan.</p> <p>By agreement with the Services, this 2016 Annual Report meets the recommendation for annual reporting.</p>

3. During spill responses involving listed sea otters, to what degree did vessel operators follow the “Boat Operation Guidance to Avoid Disturbing Sea Otters”?

USCG Western Alaska Captain of the Port (FOSC)	<p>The Southwest DPS of the Northern sea otter were an applicable listed species for the response to the F/V AMBITION, and the Boat Operation Guidance to Avoid Disturbing Sea Otters was passed verbally and via email from the FOsCR to the salvage company. The salvor observed several sea otters within their search grid, and reported that “all operations were conducted in accordance with the recommendations in the Alaska Spill Response Emergency Endangered Species Act Consultation initiation documents.”</p>
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USCG Prince William Sound Captain of the Port (FOSC)	There was training on this subject for the primary response contractor in PWS in October 2016. FWS was involved in this training/exercise.
USCG South East Alaska Captain of the Port (FOSC)	For CY2016, there were no known oil discharge responses within Sector Juneau's area of responsibility that directly involved USCG vessel encounters with sea otters. CG-qualified coxswains who are assigned to Sector Juneau subunits are aware of the USFWS "Boat Operation Guidance to Avoid Disturbing Sea Otters," and try to adhere to those guidelines to the best of their ability.
USEPA Region 10	N/A
Alaska RRT	N/A

4. What, if any, site-specific Ecological Risk Assessments (ERA) for threatened and endangered species and sensitive habitat areas were conducted in your AOR? Was FWS involved in and/or notified of such ERAs? Were these ERAs incorporated into your SCP?

USCG Western Alaska Captain of the Port (FOSC)	No Ecological Risk Assessments have been conducted in the Sector Anchorage AOR in 2016.
USCG Prince William Sound Captain of the Port (FOSC)	A form ICS-232 was completed for the Tesoro Exercise in October 2016 and the Cordova Exercise in March 2016. These incident specific resources at risk summaries were not incorporated into the PWS SCP. FWS was involved with both exercises in the Environmental Unit. No formal Ecological Risk Assessments have been conducted for PWS.
USCG South East Alaska Captain of the Port (FOSC)	Sector Juneau and its subunits did not conduct any ERA with USFWS during CY2016.
USEPA Region 10	No Ecological Risk Assessments have been conducted by USEPA in Alaska in 2016
Alaska RRT	No formal ERAs were conducted in the Alaska region in 2016. The last such ERA was conducted in the Northwest Arctic subarea in March 2012. FWS was involved in that effort.

5. Refer to Conservation Recommendations 5.a.- e. These region-wide dispersant use policy issues are addressed below by the Alaska RRT.

Because ESA formal consultation of the *Alaska Unified Plan* included a review of the then draft *Dispersant Use Plan for Alaska* (Alaska Unified Plan, Annex F, Appendix I), precautions described in Conservation Recommendation 5.d. were incorporated into the final version following issuance of the FWS BiOp. Recommendations 5.a. and 5.c are within the purview of or subject to completion of ongoing work of national level standards-setting organizations or working groups such as NOAA’s National State-of-Science Dispersant Initiative. Recommendation 5.e. is under the sole authority of EPA headquarters (working on proposed revision of *National Contingency Plan*, Subpart J). The Alaska RRT continues to monitor ongoing work, per Recommendation 5.b., at the national level through regular participation in National Response Team (NRT) meetings and direct liaison with federal agency headquarters.

6. {Applicable only to FOSC for Western Alaska and the North Slope SubArea (specifically Hanna Shoal).} Describe any relevant dispersant use planning, exercises, or response coordination with FWS.

USCG Western Alaska Captain of the Port (FOSC)	Sector Anchorage did not participate in any dispersant use exercises or responses in 2016, outside of participation in RRT discussions.
- USCG Prince William Sound Captain of the Port (FOSC)	N/A
- USCG South East Alaska Captain of the Port (FOSC)	- N/A
USEPA Region 10	N/A
Alaska RRT	The Alaska RRT has passed this Recommendation on to the relevant FOSC for consideration and looks forward to further opportunities to work with FWS.

7. {Applicable only to areas where short-tailed albatrosses are found.} Describe any relevant dispersant use planning, exercises, or response coordination with FWS.

USCG Western Alaska Captain of the Port (FOSC)	<p>Sector Anchorage did not participate in any dispersant use exercises or responses in 2016, outside of participation in RRT discussions.</p> <p>The US Coast Guard, Environmental Protection Agency and State of Alaska held 4 public outreach meetings in Kenai, Valdez, Kodiak and Unalaska and attended provided an information table at the 26<sup>th</sup> annual Bureau of Indian Affairs</p>
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	<p>Providers Conference in Anchorage. The meetings were used to gather public input to identify off-shore locations where the use of oil spill dispersants should be avoided within the Preauthorization areas found in the Dispersant Use Plan for Alaska. The meetings featured presentations on the policy and the science of dispersants. The public comment period ended 09 January 2017 in which 34 comments were submitted some of which directly mentioned the short tailed albatross. The technical committee of federal and state agency personnel (including DOI, USFWS, and NMFS reps) are reviewing the comments before recommending Avoidance Areas (which revert some portions of the Preauthorization Area to Undesignated Area) for Federal On-Scene Coordinators approval. This would include the information obtained on locations where short tailed albatrosses are found.</p>
<ul style="list-style-type: none"> <li>- USCG Prince William Sound Captain of the Port (FOSC)</li> </ul>	<ul style="list-style-type: none"> <li>- Short- tailed Albatross habitat was identified and will likely be incorporated into the PWS SCP Dispersant Avoidance Areas in accordance with recommendation from the DOI.</li> </ul>
<ul style="list-style-type: none"> <li>- USCG South East Alaska Captain of the Port (FOSC)</li> </ul>	<ul style="list-style-type: none"> <li>- Short-tailed albatrosses are not common to the Southeast Alaska region. They primarily inhabit territories in and around the Gulf of Alaska and the Bering Strait, which are beyond the boundaries of the Sector Juneau AOR.</li> </ul>
USEPA Region 10	N/A
Alaska RRT	The Alaska RRT has passed this Recommendation on to the relevant FOSCs for consideration and has ensured regional policy requires consultation with FWS during response planning.

8. Describe any section 7 consultation with FWS for oil spill preparedness drills, exercises, or other pre-spill activities.

USCG Western Alaska Captain of the Port (FOSC)	Sector Anchorage was a participant in several exercises and drills, including a GRS deployment in Nome. However, Sector was not the hosting party and therefore did not conduct any section 7 consultations for 2016 drills or exercises.
USCG Prince William Sound	The FOSC for Prince William Sound has a Quick Reference Card (QRC) which requires the notification to resource

Captain of the Port (FOSC)	trustees (DOI & NOAA) for all spill responses. During incidents that pose a potential for oil discharges, DOI and NOAA are also notified as a courtesy in case the situation were to change. FWS was also contacted last year to provide an opinion on the oil spill surrogates exercise in Whittier, although not an official consultation.
USCG South East Alaska Captain of the Port (FOSC)	During CY2016, Sector Juneau did not conduct any drills or exercises that involved Section 7 consultations. A “pre-spill activity” consultation was completed for the M/V CHALLENGER salvage case, but that did not involve USFWS personnel (because no ESA listed resources under USFWS purview were considered to be at risk by CHALLENGER operations).
USEPA Region 10	EPA did not conduct training or exercise activities in Alaska with potential to adversely impact threatened or endangered species or their critical habitats.
Alaska RRT	The Alaska RRT has informed the FOSCs and their exercise planners of the need to consider Section 7 consultation during oil spill preparedness drills and other pre-spill activities and is monitoring implementation.

9. Refer to Conservation Recommendation 9. These region-wide dispersant use policy issues are addressed below by the Alaska RRT.

No pollution response cases in 2016 were considered for dispersant use. Moreover, because ESA formal consultation of the *Alaska Unified Plan* included a review of the then draft *Dispersant Use Plan for Alaska* (Alaska Unified Plan, Annex F, Appendix I), this Recommendation was addressed through procedures described in the final version which includes consultation of Service biologists in certain instances (including in molting and wintering areas). It also is addressed, in part, through an ongoing effort to identify dispersant use areas to be avoided in the five subareas affected by implementation of the dispersant Preauthorization Area. The USCG, EPA, and State of Alaska held 4 public outreach meetings in Kenai, Valdez, Kodiak and Unalaska (addressing the five subareas) and attended and provided an information table at the 26<sup>th</sup> annual Bureau of Indian Affairs Providers Conference in Anchorage. The meetings were used to gather public input to identify off-shore locations where the use of oil spill dispersants under the Preauthorization Protocol should be reverted to the Case-by-Case Protocol within the Preauthorization Areas found in the *Dispersant Use Plan for Alaska*. The meetings featured presentations on the policy and the science of dispersants. The public comment period ended 09 January 2017 in which 34 comments were submitted. The technical committee of federal and state agency personnel (including DOI, USFWS, and NMFS reps) are reviewing the comments before recommending Avoidance Areas for Federal On-Scene Coordinators approval.

10. {Applicable only to FOSC for Western Alaska and the Northwest Arctic SubArea (specifically St. Lawrence Island).} Describe any relevant effort to establish a winter no transit zone for vessel traffic in spectacled eider critical habitat south/southwest of St. Lawrence Island.

USCG Western Alaska Captain of the Port (FOSC)	USCG District 17 staff are working in conjunction with the Bering Sea Port Access Routing Study (PARS) to address critical habitat concerns around St. Lawrence Island. Current recommendations to USCG Headquarters include establishing an area to be avoided around St. Lawrence Island to address various agency wildlife concerns. More information is available through the District 17 Point of Contact, LCDR Michael Newell, Chief of the Waterways Management Branch.
USCG Prince William Sound Captain of the Port (FOSC)	N/A
USCG South East Alaska Captain of the Port (FOSC)	N/A
USEPA Region 10	N/A
Alaska RRT	N/A

11. Describe your efforts to use a standardized emergency consultation form (across all FOSC areas) for consultation initiation and conclusion.

USCG Western Alaska Captain of the Port (FOSC)	The Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation form (revised 2/20/2015) has been used for each case initiated by Sector Anchorage in 2016. Sector Anchorage, USFWS, NMFS and the D17 Scientific Support Coordinator are in the process of creating a template for the emergency consultation closeout that addresses concerns for both USFWS and NMFS, intended for use throughout District 17.
USCG Prince William Sound Captain of the Port (FOSC)	MSU Valdez Response Department is participating in the current effort to create a newer, standardized ESA Consultation initiation form. It will be added to the unit's QRC once approved by the interagency work group developing it. The consultation initiation form was used successfully during the 2016 Tesoro Shippers Oil Spill Exercise in PWS.
USCG South East Alaska	Whenever consultations are warranted between USCG and



Captain of the Port (FOSC)	either USFWS or NMFS, responders complete an “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form, in concert with representatives from the appropriate trustee agency. The form has been standardized in such a way as to guide virtually any action agency through the consultation process. The agencies that have been involved in the development and standardization of that form include: DOI, USFWS, NPS, NMFS, NOAA Scientific Support Coordinators, Environmental Protection Agency, and USCG [District 17, Sectors, Marine Safety Detachments (MSD), etc.].
USEPA Region 10	USEPA has no objection to inclusion of the standardized emergency consultation form developed by the services as part of the Unified Plan.
Alaska RRT	See response to 2.c. above and note the improvements described by the FOscs in the development of a standardized ESA Consultation Closeout form for the region. The ARRT will consider adding this new form to Alaska Unified Plan.

12. Refer to Conservation Recommendation 12.

This will be addressed by the Alaska RRT in future revision to *Wildlife Protection Guidelines* (Annex G) of the Alaska Unified Plan.

13. Refer to Conservation Recommendation 13.

This will be addressed by the Alaska RRT in future revision to *Alternative Countermeasures* (Annex F) of the Alaska Unified Plan.

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NMFS BiOp (pages 147-151), see attached

7.2 Reasonable and Prudent Measures (RPM)

7.2.1 Terms and Conditions (T&C)

For RPM#1 – *“The USCG/EPA shall implement measures to reduce the probability of exposing bowhead whales, humpback whales, Cook Inlet beluga whales, western DPS Stellar sea lions, ringed seals, bearded seals, and salmon to oil spill response related stressors.”*

1. Describe efforts to ensure all field deployed response personnel involved with spill response in a manner which may result in incidental take are provided the information outlined in the NMFS BiOp.

USCG Western Alaska Captain of the Port (FOSC)	For any case where NMFS, USFWS, SSC, or ADF&G, either verbally or via a formal Section 7 Consultation or form ICS-232, make recommendations for response operations to
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	<p>include avoiding incidental take, those recommendations are carefully reviewed by the FOSCR and passed to responders on-scene as applicable.</p> <p>Sector IMD coordinated and attended training with the Scientific Support Coordinator on the ESA section 7 emergency consultation procedures, including an overview of the NMFS and FWS biological opinions, to increase responder awareness.</p>
<p>USCG Prince William Sound Captain of the Port (FOSC)</p>	<p>Recommend including the BiOP as a part of regular Alyeska/SERVS and Fishing Vessel Program Training to ensure awareness of the document. Recommend formalized training for all MSU Valdez response personnel on BiOp recommendations and required consultation procedures.</p>
<p>USCG South East Alaska Captain of the Port (FOSC)</p>	<p>GRS' and the Southeast Alaska Subarea Contingency Plan provide summary information describing potential resources at risk, as well as NMFS points of contact. This preliminary information allows field-deployed USCG responders to determine likely consultation requirements (formal vs. informal). However, due to high personnel turnover and need for newcomer orientation to the uniqueness of the Alaskan AOR, not all USCG response personnel within the Sector Juneau AOR are fully aware of the expectations and requirements set forth in the NMFS 2015 Biological Opinion (BiOp). To improve responder awareness, Sector Juneau Incident Management Division (IMD) personnel will propose a training plan, to include delivery of in-person instruction during 2017. If approved, the training would be presented in Juneau, Sitka, and Ketchikan. Training content would include (but not be limited to):</p> <ul style="list-style-type: none"> <li>• Summary of NMFS 2015 Biological Opinion content</li> <li>• Definition of 'incidental take,' and common measures to avoid it</li> <li>• Factors triggering a Section 7 consultation with natural resource trustee agencies</li> <li>• Section 7 consultation procedures and documentation</li> <li>• Section 7 post-response consultation close-out procedures and documentation</li> <li>• Trustee agency points of contact (DOI, USFWS, NPS; NMFS, NOAA SSC;</li> </ul>

	etc.)
- USEPA Region 10	USEPA did not conduct any responses in Alaska in 2016
Alaska RRT	This will be addressed by the Alaska RRT in future revision to <i>Wildlife Protection Guidelines</i> (Annex G) of the Alaska Unified Plan.

2. Describe efforts to ensure all contracted personnel involved with spill response in a manner which may result in incidental take are provided the information outlined in the NMFS BiOp.

USCG Western Alaska Captain of the Port (FOSC)	For any case where NMFS, USFWS, SSC, or ADF&G, either verbally or via a formal Section 7 consultation or form ICS-232, make recommendations for response operations to include avoiding incidental take, those recommendations are carefully reviewed by the FOSCR and passed to the contractor on-scene as applicable.
USCG Prince William Sound Captain of the Port (FOSC)	Currently working on implementing the following recommendations: 1) including the BiOp as a part of regular Alyeska/SERVS and Fishing Vessel Program Training to ensure awareness of the document; 2) formalizing training for all MSU Valdez response personnel on BiOp recommendations and required consultation procedures; 3) conducting BiOp familiarization training with oil spill removal organizations (OSRO) that could potentially respond to an oil spill/hazardous substance release in the PWS AOR.
USCG South East Alaska Captain of the Port (FOSC)	Whenever contractors are hired for response operations, incidental take guidance is generally passed during the “tailgate” briefings that precede the start of all operations. If a formal Incident Command post is established for a particular response, incidental take information would likely be captured on form ICS-204 (Assignment List), and subsequently conveyed by a Division/Group Supervisor to contracted personnel. Contractors generally do not submit their own documentation of training received and/or actions taken to adhere to BiOp requirements. Instances of take committed by contractor assets – even if unintentional – are likely the most difficult to track/document.
USEPA Region 10	- USEPA did not conduct any spill responses in Alaska in 2016
Alaska RRT	This will be addressed by the Alaska RRT in future revision to

	relevant portions of the <i>Alaska Unified Plan</i> .
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3. Tiered Emergency Consultation

A. What measures are taken to contact a Section 7 biologist from NMFS to confirm whether a spill response is within the range of a listed species or a designated critical habitat?

<p>USCG Western Alaska Captain of the Port (FOSC)</p>	<p>For all cases, the Sector FOSCRs make regular contact with a DOI representative who acts as a liaison between the USCG and NMFS. However, DOI often connects the appropriate NMFS representative with the duty FOSCR if needed. For Emergency Section 7 Consultations, the Sector FOSCRs contact the D17 Scientific Support Coordinator to initiate and follow up directly with NMFS, USFWS, and the SSC as needed to clarify questions or recommendations.</p> <p>MSD Homer conducted the following emergency consultation:</p> <p>On 19NOV16, Hillcorp Inc. advised MSD Homer that an unknown oil was discovered in one of the Tyonek Platform legs. They stated that there was no potential path of discharge for the oil but that they would be investigating further to determine the source. On 26NOV16, Hillcorp advised MSD Homer that sampling concluded that the unknown oil was about 69,000 gallons of diesel fuel and had originated from a fuel tank on the platform that has a fuel line that runs through the leg. Hillcorp Inc. contracted a local Oil Spill Response Organization to transfer the diesel fuel out of the leg and dispose of it. An Emergency ESA Section 7 Consultation was initiated and completed on 27NOV16.</p>
<p>USCG Prince William Sound Captain of the Port (FOSC)</p>	<p>MSU Valdez personnel contact the NOAA SSC to report all spills in the PWS COTP Zone. If response equipment or actions are to potentially impact endangered species or critical habitat, the NMFS is contacted directly.</p>
<p>USCG South East Alaska Captain of the Port (FOSC)</p>	<p>Whenever Sector Juneau pollution responders receive notification of a discharge, they contact Department of the Interior (DOI) employees [including USFWS or National Park Service (NPS) staff] and National Oceanic and Atmospheric Administration (NOAA) representatives, to inform them of the discharge (location, size, type of product, etc.). Sector Juneau Pollution Responders may also use this call to seek technical assistance prior to initiating either an informal or formal consultation. Based on the nature of a particular discharge, DOI and NOAA personnel advise USCG</p>

	<p>responders whether listed species and/or designated critical habitats are likely to be impacted. If an informal or formal consultation is warranted, the responder then completes the “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form, in concert with the appropriate trustee agency representative(s).</p> <p>Additionally, District 17 personnel (D17, Sectors, MSDs) are working jointly to create a standardized quick response card for Pollution Responders (PR). The PR quick response card will include trustee agency contact information and agency-specific consultation thresholds (size/scope/location of a discharge). Whenever a discharge meets or exceeds a stated threshold for any of the trustee agencies, consultations will be initiated with the points of contact listed on the card.</p> <p>In the training described in Question 1 above, Sector Juneau personnel will ensure that MSD Ketchikan and MSD Sitka members follow similar procedures.</p>
USEPA R10	USEPA did not conduct any spill responses in Alaska in 2016
Alaska RRT	<p>FOSCs understand and comply with the requirements of the 2001 Interagency MOU. This MOU is currently the under review by a National Response Team subcommittee and may be revised to clarify certain policies and practices. Meanwhile, the ARRT has shared with FOSCs the content of T&amp;C 3.A. – 3.G. and is monitoring compliance. These requirements, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i>.</p>

**B. Describe your process for Emergency Consultation with NMFS.**

USCG Western Alaska Captain of the Port (FOSC)	For Emergency Section 7 Consultations, the Sector FOSCRs contact the D17 Scientific Support Coordinator to initiate and follow up directly with NMFS, USFWS, and the SSC as needed to clarify questions or recommendations.
USCG Prince William Sound Captain of the Port (FOSC)	MSU Valdez personnel contact the NMFS via phone and/or email to pass all pertinent information. Once the Consultation initiation form is completed and approved it will be the primary information gathering tool used to

	transmit response data to the NMFS.
USCG South East Alaska Captain of the Port (FOSC)	<p>Sector Juneau pollution responders essentially use the same procedure for: 1) confirming whether a spill response is within the range of listed species/critical habitat, or 2) initiating an emergency consultation. When notification of a discharge is received, the responder contacts Department of the Interior (DOI) and NOAA representatives to inform them of the discharge (i.e., location, size, type of product, etc.). Based on the nature of the discharge, DOI and NOAA personnel then advise the USCG responder whether either an informal or formal consultation is warranted. If warranted, the responder completes the “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form, in concert with the appropriate trustee agency representative.</p> <p>As stated in the previous question, Sector and MSD personnel across D17 are working jointly to create a standardized quick response card for Pollution Responders (PR). The PR quick response card will include trustee agency contact information and agency-specific consultation thresholds (size/scope/location of a discharge). Whenever a discharge meets or exceeds a stated threshold, consultations should be initiated with the points of contact listed on the card.</p> <p>In the training described in Question 1 above, Sector Juneau personnel will ensure that MSD Ketchikan and MSD Sitka members follow similar procedures.</p>
USEPA Region 10	The process for emergency consultation is described in the 2001 Interagency MOU, and in Section II of Annex G (Wildlife Protection Guidelines) of the Unified Plan.
Alaska RRT	<p>FOSCs understand and comply with the requirements of the 2001 Interagency MOU. This MOU is currently under review by a National Response Team subcommittee and may be revised to clarify certain policies and practices. Meanwhile, the ARRT has shared with FOSCs the content of T&amp;C 3.A. – 3.G. and is monitoring compliance. These requirements, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i>.</p>

C. Describe your process to review each spill response to ensure that all adverse effects to listed species, their prey, and the habitats were within the range of effects considered in the NMFS BiOp.

<p>- USCG Western Alaska Captain of the Port (FOSC)</p>	<p>- In all cases, the Sector FOSCRs make regular contact with a DOI representative who acts as a liaison between the USCG and NMFS. For Emergency Section 7 Consultations, the Sector FOSCRs contact the D17 Scientific Support Coordinator to initiate and follow up directly with NMFS, USFWS, and the SSC as needed to clarify questions or recommendations.</p> <p>Any feedback provided from NMFS, USFWS or the SSC is carefully reviewed by duty personnel and applied to the response. Recommendations are clearly articulated to the responding party, whether the Responsible Party, USCG or a contract organization.</p>
<p>USCG Prince William Sound Captain of the Port (FOSC)</p>	<p>The BiOp is available as guidance for all MSU Valdez responders to consult during actual or planned response operations.</p>
<p>USCG South East Alaska Captain of the Port (FOSC)</p>	<p>Sector Juneau is currently working with NMFS personnel to formalize the process of documenting whether response-related effects on listed species, their prey, and/or corresponding habitats fall within the range of effects addressed in the 2015 BiOp. Beginning in December 2016, Sector Juneau Response Department personnel initiated formal meetings with NMFS to discuss and implement a “Post-Response Consultation Close-out Form.” The close-out form is already drafted, and NMFS personnel are in the process of collecting/incorporating comments from the response community to finalize it. The form is intended to be used in concert with the “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form, and includes:</p> <ul style="list-style-type: none"> <li>• Identification of species observed during a response;</li> <li>• The range at which species were observed; and</li> <li>• Behaviors displayed by observed species.</li> </ul> <p>Any form of incidental take, including mortality and/or injury, could also be documented on the form. The information captured in each close-out form would then be compared to recommendations set forth in the 2015 BiOp. Any effects that depart from/violate BiOp requirements could be summarized and submitted to the appropriate trustee agency for corrective action.</p>

USEPA Region 10	USEPA will review each incident to determine whether or not response activities were within the range of effects considered in the NMFS BiOp. In 2016, no spill responses were conducted by USEPA in Alaska.
Alaska RRT	FOSCs understand and comply with the requirements of the 2001 Interagency MOU. This MOU is currently the under review by a National Response Team subcommittee and may be revised to clarify certain policies and practices. Meanwhile, the ARRT has shared with FOSCs the content of T&C 3.A. – 3.G. and is monitoring compliance. These requirements, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i> .

D. Refer to T&C 3.D.

Considered under response in subpara. B. above.

E. Describe measures taken to ensure notification of responders that no take of North Pacific right whales is authorized.

USCG Western Alaska Captain of the Port (FOSC)	Take of North Pacific right whales has not been addressed directly this year, as this species has not been a particular concern within the response area for any Western Alaska FO SC cases in 2016. However, all recommendations listed by NMFS or USFW under section 7 consultations are carefully considered by the FO SCR and passed to responders as applicable.
USCG Prince William Sound Captain of the Port (FO SC)	N/A
USCG South East Alaska Captain of the Port (FO SC)	Sector Juneau response personnel are not fully aware of the no-take requirements for Northern Pacific right whales. Although Northern Pacific Right Whale sightings would likely be exceedingly rare within the Sector Juneau AOR, relevant considerations will be incorporated into the training detailed in Question 1 above.
USEPA Region 10	N/A
Alaska RRT	N/A  This Recommendation, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant



	portions of the <i>Alaska Unified Plan</i> .
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F. Describe any instances in which marine mammals were taken in a manner other than that described in the NMFS ITS (Incidental Take Statement).

USCG Western Alaska Captain of the Port (FOSC)	There were no known incidental takes resulting from response activities in 2016.
USCG Prince William Sound Captain of the Port (FOSC)	N/A
USCG South East Alaska Captain of the Port (FOSC)	There were no known instances of incidental take during Sector Juneau-led responses in 2016. During the training described in Question 1, instructors will address the fact that USCG responders must report all 'take' occurrences, particularly those that depart from NMFS-issued Incidental Take Statements.
USEPA Region 10	No marine mammals were taken in Alaska as a result of USEPA spill response activities in 2016.
Alaska RRT	N/A  This Recommendation, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i> .

G. Describe any instances during a USCG-supervised spill response in which a sick, injured, or dead marine mammal(s) under NMFS's authority were observed and reported to NMFS Alaska Region through the incident commander.

USCG Western Alaska Captain of the Port (FOSC)	Porpoises were observed transiting through the diesel sheen during the F/V ALASKA JURIS response. Contractors on-scene notified the Incident Management Team via email, including photos and location. The Environmental Unit was notified, including a NMFS representative participating via conference call. The observation was also addressed in the closeout for this case, which was forwarded to NMFS and USFWS. Other than this on-scene observation, no sick, injured, or dead marine mammals were observed or reported for this or other cases in 2016.
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USCG Prince William Sound Captain of the Port (FOSC)	N/A
USCG South East Alaska Captain of the Port (FOSC)	There were no known reports of sick, injured, or dead marine mammals observed during Sector Juneau-led responses in 2016. During the training described in Question 1, instructors will address the fact that USCG responders must report all such observations to NMFS Alaska Region personnel.
USEPA Region 10	N/A
Alaska RRT	N/A  This Recommendation, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i> .

For RPM#2 – *“The USCG/EPA shall implement a monitoring and documentation program that allows NMFS to evaluate the spill response action exposure estimates contained in this Biological Opinion that underlie the ITS.”*

1. Describe your FOSC efforts to document effects of response methods to listed species, their prey, and habitat to include:
  - A. Species Affected
  - B. Habitat Area and Type
  - C. Temporal Effects

USCG Western Alaska Captain of the Port (FOSC)	For each case where an Emergency Section 7 consultation was made, the FOSCRs conduct Section 7 Consultation closeout statements for NMFS and USFWS, working closely with agency representatives to address their needs and concerns.  Currently, Sector is working with NMFS, USFWS and the SSC to create a template for this closeout document that will streamline the process to specifically address the needs of both the NMFS and USFW Biological Opinions, to include the above list.
USCG Prince William Sound Captain of the Port (FOSC)	The FOSC in Prince William Sound makes every effort to involve NMFS in Exercises and relevant training to drive the documentation process for the effects of response operations on listed species and habitats. When new response methods and equipment are proposed, potential environmental

	impacts are considered before authorization for use in certain areas.
USCG South East Alaska Captain of the Port (FOSC)	<p>Consultation documentation of the potential effects of response operations on NMFS-protected species (and/or their habitat) was compiled for three responses during 2016: F/V YANKEE, M/V BIG RED, and M/V CHALLENGER. The F/V YANKEE case was handled by MSD Sitka personnel. The M/V BIG RED and M/V CHALLENGER cases were managed by Sector Juneau personnel.</p> <p>In all three cases, NMFS stated that Steller sea lions and humpback whales were <i>potentially</i> vulnerable to impacts arising as a result of response operations. However, NMFS ultimately found that USCG response actions were “not likely to adversely affect” those species. For the M/V BIG RED case, that finding was documented on a signed “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form. For the F/V YANKEE and M/V CHALLENGER cases, those findings were documented on a Letter of Concurrence, directed from NMFS to the District 17 Commander.</p> <p>Regarding all future cases, Sector Juneau will continue to initiate contact with natural resource trustee agencies for all discharge notifications. Similarly, for those cases that require either informal or formal consultation, responders will continue to use the “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” and “Post-Response Consultation Close-out” forms to document potential or actual effects.</p>
USEPA Region 10	The USEPA made no efforts to document effects of response methods to listed species, as it conducted no spill responses in Alaska in 2016.
Alaska RRT	The ARRT has shared with FOscs the content of T&C 1.A. – 1.C. and is monitoring compliance. These requirements, and any changes to the 2001 MOU, will be considered for inclusion in updates to relevant portions of the <i>Alaska Unified Plan</i> .

This submission constitutes compliance with Annual Monitoring Report requirement.

### 8.o Conservation Recommendations

With the exception of item 6 (which is a matter solely for the EPA’s National Product Schedule), the conservation recommendations provided in this section are the responsibility of the Alaska RRT or are incident-specific measures. However, FOSCs are free to establish relevant policy at the SubArea Committee/SubArea Contingency Plan level or implement these or similar measures during a response.

USCG Western Alaska Captain of the Port (FOSC)	N/A
USCG Prince William Sound Captain of the Port (FOSC)	N/A
USCG South East Alaska Captain of the Port (FOSC)	<p>USCG responders implement the conservation recommendations set forth in the NMFS 2015 BiOp as directed, on a case-by-case basis. USCG generally receives such direction via NMFS-specific input documented in an “Alaska Region Spill Response Emergency Endangered Species Act Consultation Initiation” form. Some Sector Juneau units have communicated a desire for the following types of guidance, for those times when conservation-related mitigating actions are advised by trustee agency representatives:</p> <ol style="list-style-type: none"> <li>1. Broader guidelines regarding how to avoid wildlife throughout an entire response operation, to accompany/supplement day-to-day wildlife avoidance instructions;</li> <li>2. Improved training and/or deployment of trained observers who can accompany USCG responders to assist with accurate wildlife/habitat identification during operations.</li> </ol> <p>Additionally, Sector Juneau Response Department personnel propose that USCG take the following actions to improve documentation, tracking, and expertise related to endangered species consultations:</p> <ol style="list-style-type: none"> <li>1. Finalize and implement a qualification process for Environmental Unit Leaders, to be assigned to the Planning Section, including consultation specific sign-off requirements. Alternately, consultation-specific sign-offs could be incorporated into the</li> </ol>

	<p>Planning Section Chief PQS. Doing so would enhance USCG member proficiency with consultations through direct training and/or experience.</p> <ol style="list-style-type: none"> <li>2. Design and execute contingency planning and preparedness drills that focus on the Endangered Species Act Section 7 consultation process, beginning with initial contact between USCG and NMFS, and concluding with a post-response consultation close-out summary report. Doing so would enhance member proficiency with consultations through direct training and/or experience, while also improving USCG partnerships with natural resource trustee agencies.</li> <li>3. Develop and maintain a formal means of tracking those cases requiring consultation and/or mitigating actions. The tracking mechanism should include: <ul style="list-style-type: none"> <li>• Incident name, date, location, and description</li> <li>• Identification of species/sensitive areas potentially impacted</li> <li>• Relevant trustee agencies and point of contact information</li> <li>• Mitigating actions required/taken</li> <li>• Impacts observed.</li> </ul> </li> </ol>
USEPA Region 10	N/A
Alaska RRT	<p>The ARRT has shared these Conservation Recommendations with the FOSCs. Some are being implemented during response operations. All will be considered for inclusion in future updates to relevant portions of the <i>Alaska Unified Plan</i>. NMFS will be notified of these updates and other implementation efforts via future <i>ARRT Annual ESA Compliance Reports</i>.</p>

