

**UNITED STATES COAST GUARD (COAST GUARD) RECORD OF DECISION FOR OFFSHORE PATROL CUTTER ACQUISITION PROGRAM**  
**FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT/OVERSEAS ENVIRONMENTAL IMPACT STATEMENT (PEIS/POEIS)**

**The Coast Guard decision is:** To continue the acquisition of up to 21 Offshore Patrol Cutters (OPCs) and operation of up to 25 total OPCs each with a design service life of 30 years to replace 28 aging Medium Endurance Cutters (MECs; *Famous* and *Reliance*-Class).

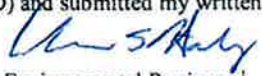
**The purpose and need for the action is:** The purpose of the Proposed Action is to provide the Coast Guard with a reliable and operationally available presence to accomplish assigned missions in offshore waters exceeding 50 nautical miles (nm) (93 kilometers [km]) from shore. These missions may require an extended on-scene vessel presence, a long transit time to reach the operational area, or a forward deployment of forces in support of national defense. Therefore, the Coast Guard proposes to acquire and operate up to 25 OPCs to bridge the Coast Guard's operational capability gap between the National Security Cutters that patrol the open ocean and the Fast Response Cutters, which primarily operate within 50 nm (93 km) from shore. The need for new OPCs is to replace the aging MECs (*Famous* and *Reliance*-Class) and the United States Coast Guard Cutter (USCGC) ALEX HALEY because they are becoming technologically obsolete and increasingly expensive to maintain and operate.

**Alternatives examined are:** Alternative 1: the Coast Guard would acquire and operate up to 25 OPCs to fulfill mission requirements in the Atlantic Ocean, Gulf of Mexico, and Pacific Ocean, including Alaska, and Hawaii and Pacific Islands. Completed construction of one new OPC is scheduled annually through 2028; therefore, construction of OPC-1-4 would be completed by fiscal year 2027. Beginning in 2029, two new OPCs would be constructed annually with a projected construction completion date for all 25 OPCs by 2037. OPCs would be operationally ready one year after delivery to the Coast Guard from the shipbuilder. This notional construction schedule would allow for MECs to be decommissioned and the Coast Guard to remain present with no delay in service to complete the Coast Guard's missions.

Alternative 2: The Coast Guard would explore the acquisition of fewer OPCs after the completion of OPC-1 through OPC-4 (which are still under contract). Five, ten, or fifteen OPCs would be considered via a re-competition of the original OPC contract as replacements for a corresponding number of in-service MECs. The Coast Guard would then replace the remaining MECs on a one-for-one basis, using whatever replacement hulls the Coast Guard could obtain when deterioration or obsolescence requires decommissioning. The life cycle training and logistical costs of maintaining several unique hulls would exceed the corresponding costs of maintaining a class of 25 cutters that would be built specifically to conduct missions in proposed action areas. Costs and challenges are similar to what is described under Alternative 3.


Alternative 3: The Coast Guard would explore various forms of cutter purchase or lease, or inherit vessels from the Navy, as the need arises. This would mean that as a MEC reaches or surpasses the end of its economic service life, that cutter would not necessarily be replaced with the same type of asset or by an asset with similar capabilities. The challenges involved with one-for-one MEC replacements are best demonstrated by the 1999 acquisition of the U.S. Navy's USS EDENTON, a salvage and rescue ship. The Coast Guard recommissioned the ship as the USCGC ALEX HALEY. The ship was designed in the early 1970s and, except for replacing her aged diesel engines, no significant environmental improvements were made. This is typical of a one-off ship acquisition because there is little justification for the extensive or expensive non-recurring design engineering costs for specifications that would make the vessel capable of conducting missions assigned to MECs. Maintenance records maintained by the Surface Forces Logistics Center confirm the maintenance costs per operating hour for USCGC ALEX HALEY (\$2,345) are 62 percent higher than the equivalent costs for maintaining the average 270 ft (82 m) cutter (\$1,445), as is typical for a one-of-a-kind ship. One-for-one MEC replacement would cost far more per replacement hull because it eliminates any workforce savings associated with a ship with capabilities designed specifically to conduct Coast Guard missions in areas that may exceed 50 nm (93 km) from shore. The purchase, lease, or inherit alternative includes the lack of an existing domestic commercial vessel capable of meeting available options to Purchase and Build-to-Lease. One of the major challenges with this approach is that the Coast Guard would not have an integrated system of systems, thus assets would not be able to communicate in real time, they would operate at differing levels of efficiency (resulting in decreased efficiency throughout the system), and maintenance costs would be higher.

No Action Alternative: The Coast Guard would acquire OPC-1 through OPC-4, then would fulfill its missions in the Atlantic Ocean, Gulf of Mexico, and Pacific Ocean (including Alaska and Hawaii and Pacific Islands) using

<p>existing assets, which are reaching the end of their service lives. The existing assets would continue to age, causing a decrease in efficiency of machinery as well as an increased risk of equipment failure or damage, and would not be considered reliable for immediate emergency response. In addition, it would become more difficult for an aging fleet to remain in compliance with environmental laws and regulations and standards for safe operation. Further Service Life Extensions become more challenging as significant systems and parts are no longer available, which requires contracting for systems or parts to be made specifically for the vessel. The No Action Alternative would also not meet the Coast Guard's statutory mission requirements in the Atlantic and Pacific Oceans and Gulf of Mexico by providing air, surface, and shore-side presence in those areas. The Coast Guard also enforces the Marine mammal Protection Act and Endangered Species Act, and without reliable Coast Guard presence, enforcement of these laws would be significantly reduced. As such, the No Action Alternative does not meet the purpose and need, but is included here for comparison of environmental impacts with the Preferred Alternative.</p>			
<p>The environmentally preferable alternative is Alternative 1.</p>			
<p><b>I selected the environmentally preferable alternative because:</b> Under Alternative 1, the Coast Guard would acquire and operate up to 25 OPCs with design service lives of 30 years each to provide consistent and reliable Coast Guard presence in the proposed action areas. The OPCs would provide the majority of offshore presence for the Coast Guard's cutter fleet, bridging the capabilities of the 418 ft (774 m) National Security Cutters (NSCs), which patrol the open ocean, and the 154 ft (285 m) Fast Response Cutters (FRCs), which serve closer to shore. Similar to the current fleet's operations, the Proposed Action would include vessel and aircraft operations as well as training exercises to meet the Coast Guard's mission responsibilities in the Atlantic and Pacific Oceans (including Alaska), as described in the proposed action areas.</p>			
<p><b>The following are the economic, technical, and Coast Guard statutory mission, national policy considerations (as applicable) that were weighed in reaching my decision:</b> The OPC program is considered the Coast Guard's top acquisition priority and these cutters would provide the majority of the Coast Guard's offshore presence. The Proposed Action would allow the Coast Guard to provide surface assets to bridge the operational capability gap between the NSCs that patrol the open ocean and the FRCs, which primarily operate within 50 nm (93 km) from shore to meet mission requirements and support the United States' economic, commercial, maritime, and national security needs. The Proposed Action provides cutters built to current environmental standards which are far better for the environment than the aged cutters they replace.</p>			
<p>All practicable means of avoiding or minimizing environmental harm from the selected alternative were adopted. In accordance with the National Environmental Policy Act and Executive Order 12114, the Coast Guard has prepared this PEIS/POEIS, assessing the environmental impact of, and alternatives to, a major federal action that has the potential to significantly impact or harm the environment within the U.S. Exclusive Economic Zone and extending to the High Seas. Given the time frame between document preparation and when the first OPC may be operational, the Coast Guard acknowledges that updates to the information provided in this PEIS/POEIS may be necessary and would therefore follow appropriate processes to ensure compliance.</p>			
<p><b>The following mitigation, monitoring, and enforcement actions have been adopted.</b> The Coast Guard currently uses a variety of guidance and proactive operational measures to help minimize the environmental impacts of Coast Guard vessels and aircraft. Standard Operating Procedures (SOPs) are established for each class of cutters. SOPs for OPCs are not currently developed, since OPCs are not yet operational; however, those used on MECs are provided in Appendix C of the PEIS/POEIS, and are generally applicable to OPCs. These SOPs are subject to change, given the timeframe until all OPC vessels are fully operational.</p>			
<p>I reviewed the Programmatic Environmental Impact Statement/Overseas Environmental Impact Statement/Record of Decision (ROD) and submitted my written comments to the Proponent.</p>			
<p>07/26/2022 Date</p>	<p> Environmental Reviewer<sup>1</sup></p>	<p>CG-47 Title/Position</p>	<p>Level III Provisional, Interim I, II, or III</p>

<sup>1</sup> A Coast Guard attorney in District Legal, Legal Services Command, or Commandant (CG-LMI-E) must sign as Legal Reviewer. The individual that signs as the Proponent cannot also sign as Environmental Reviewer or Senior Environmental Professional. All signatories must be Coast Guard military or federal employees. Contractors must not sign Coast Guard environmental planning documents.

I reviewed the PEIS/POEIS/ROD and submitted my written comments to the Proponent.

07 SEP 2022  CG-47 Level III  
Date Senior Environmental Professional<sup>1</sup> Title/Position Interim, II, or III

I have reviewed the PEIS/POEIS/ROD and submitted my written comments to the Proponent.

09 SEP 2022  Chief, LMI-E  
Date Legal Reviewer<sup>1</sup> Title/Position

In reaching my decision/recommendation on the Coast Guard's proposed action, I considered the information contained in this PEIS/POEIS/ROD and considered and acknowledge the written comments submitted to me from the Environmental and Legal Reviewers.

20 SEP 2022  CAPT, USCG OFFSHORE PATROL CUTTER  
Date Proponent<sup>1</sup> Title/Position PROGRAM MANAGER

