

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commandant  
United States Coast Guard

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Washington, DC 20593-7516  
Staff Symbol: CG-MER-1 (VRP)  
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16450

Alaska Maritime Prevention & Response Network  
Attn: Mr. Buddy Custard  
1400 West Benson Blvd  
Suite 220  
Anchorage, AK 99503

DEC 14 2018

Dear Mr. Custard:

The Coast Guard reviewed your Alaska Maritime Prevention & Response Network's (AMPRN's) Alternate Planning Criteria (APC) proposal for tank vessels, submitted on May 13, 2018 in accordance with Title 33, Code of Federal Regulations, Section 155.1065, for the Western Alaska (WAK) Captain of the Port (COTP) Zone and CG-MER Policy Letter 01-17: Alternative Planning Criteria National Guidelines for Vessel Response Plans.

AMPRN's APC is accepted for tank vessels carrying group I oils and non-petroleum oils as cargo in ports or places in Western Alaska. Your clients must keep a copy of this APC attached to their respective VRPs, along with a copy of this letter onboard their vessels. Any deviation from the provisions in your APC must be communicated in writing to the Coast Guard WAK COTP for reevaluation.

This APC will take effect on **April 1, 2019** and will remain valid until **July 1, 2021**, subject to AMPRN demonstrating to the Coast Guard continued progress prior to the 2019 lightering season with the following:

1. Identify locations where lightering operations are intended and ensure response resources are available in these locations during times of vessel operations.
2. Establish detailed vessel routing procedures between designated lightering areas.
3. Provide clear contractual linkage between vessel owners/operators and resource providers. This should include formalized agreements for all supporting resources AMPRN does not own, including vessels, aircraft, and skilled labor.
4. Identify ocean response resources and explain what their capabilities are in remote locations. These resources need to comply with existing State and Federal regulatory requirements.
5. Provide a build out plan as per MER Policy Letter 01-17.

AMPRN should contact the Coast Guard WAK COTP and District Seventeen (D17) prior to the 2019 lightering season or sooner to demonstrate progress toward addressing the issues listed above. If the Coast Guard is not satisfied that adequate progress has been made towards these conditions, this APC acceptance may be subject to cancellation. If this occurs, the Coast Guard will provide written notice to AMPRN 30 days prior to cancellation in order to provide AMPRN additional time to demonstrate progress. Also, if it is determined resources are available and

capable of providing NPC for a vessel operating in any area covered by this acceptance, their VRP may not reference this APC and the plan holder must contract with resource providers able to meet their NPC requirements.

Questions concerning this letter may be directed to my VRP staff at [vrp@uscg.mil](mailto:vrp@uscg.mil).

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. M. Alonso', with a stylized flourish at the end.

R. M. ALONSO  
Captain, U.S. Coast Guard  
Chief, Office of Marine Environmental Response Policy

Copy:      Commander, Coast Guard Pacific Area (PAC-54, PAC-35)  
              Commander, Seventeenth Coast Guard District (dp, dr)  
              Commander, Coast Guard Sector Anchorage (s, sp, sr)