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13 Apr 2020

## MEMORANDUM

From: R. M. Alonso, CAPT  
COMDT (CG-MER)

Reply to: Mr. J. R. Smith  
Attn of: 202-372-2675

To: MER Stakeholders

Subj: ADJUSTMENT OF AREA CONTINGENCY PLANNING ACTIVITIES DUE TO  
COVID-19 CRISIS

Ref: (a) OMB Memo M-20-16 of 17 Mar 2020, Federal Agency Operational Alignment to Slow the Spread of Coronavirus COVID-19  
(b) ALCOAST 100/20  
(c) National Contingency Plan, 40 CFR part 300  
(d) 2016.1 Preparedness for Response Exercise Program (PREP) Guidelines  
(e) U.S. Coast Guard Marine Environmental Response and Preparedness Manual, COMDTINST M16000.14  
(f) COMDT (DCO) Memo 16471 of 02 Feb 2017

1. Pursuant to reference (a) and as a follow-up to reference (b), CG-MER is relaxing timelines and deadlines associated with several area contingency planning activities detailed in references (c) through (f). Reducing and delaying efforts associated with short-term non-mission critical functions is a necessary step in ensuring CG staff are optimally postured to assist with COVID-19 related surge activities. CG-MER recognizes that many planning staff at all levels have been re-directed to provide incident management and planning support during the COVID-19 crisis. Given current public health risks and the need to support COVID-19 surge operations at the field level, CG-MER is adjusting the timelines and deadlines as described herein.

2. **All Coast Guard Preparedness for Response Exercise Program (PREP) related activities associated with the Area Contingency Plan (ACP) should be suspended and rescheduled to the maximum extent possible.** This includes both the exercises and their associated planning activities. There is no federal statute or regulation that dictates the frequency of full-scale exercises (or that even that requires full-scale exercises). Reference (c) simply states that the Federal On-Scene Coordinator (FOSC) shall periodically conduct drills. Unlike industry response plan requirements, detailed PREP exercise requirements for ACPs are policy-based (versus prescriptive regulations) as detailed in reference (d). Considering the aforementioned and given the current circumstances, the Coast Guard is able to exercise a considerable degree of latitude with respect to the scheduling and execution of PREP related activities. Please note that rescheduling exercises for later this fiscal year or next fiscal year is acceptable to CG-MER, however any funding support may be affected and needs to be adjusted accordingly. Exercise

funding is managed by CG-OEM and District MTEP coordinators.

**3. Submission of any ACPs due to CG-MER in 2020 and scheduled for review by the Coast Guard National Review Panel (CGNRP) may be delayed until 01Sep2020.** The convening of the 2020 CGNRP as detailed in reference (e) is hereby moved from June to mid-late September. While exact dates remain TBD at this time, CG-MER will communicate all logistical details for the 2020 CGNRP as soon as practically possible.

**4. Submission of annual area committee reports as required per reference (e) may be delayed.** CG-MER requests that all annual reports be received by CG-MER no later than 01Sep2020. CG-MER requests Areas and Districts work with their respective units to adjust accordingly.

**5. The National Response Team (NRT) – ACP Workgroup workshop scheduled for June of 2020 in Minneapolis, MN is postponed.** This will be rescheduled for a later date. CG-MER will work with its NRT partners to pursue the October-November timeframe for possible reschedule dates.

6. CG-MER will continue to monitor the situation and adjust accordingly. CG-MER stands ready to assist the field in addressing any challenges and/or concerns induced by the COVID-19 crisis. My point of contact for this process is Mr. Jonathan Smith, at (202) 372-2675 or you may e-mail him at [Jonathan.R.Smith@uscg.mil](mailto:Jonathan.R.Smith@uscg.mil).

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