

## ARCTIC AND WESTERN ALASKA AREA CONTINGENCY PLAN VERSION 2018.0, RESPONSE TO COMMENT

This table consolidates federal and state agency planner responses to those comments received during the State of Alaska’s Public Review for Version 2018 of the AWA ACP. Where appropriate, edits were made to address the comment within the AWA ACP, the issue was communicated to the Area Committee for resolution, or comment resolution was deferred to a later date.

No.	Comment	Additional Comment or Rationale for Recommended Change	Agency Response to Comment
1.	Several comments suggested: Include a map delineating PWS Area and insert language confirming that Area planning boundaries are consistent with previous SCP boundaries.	The language outlining the geographic boundaries of the Prince William Sound Area differs from the language currently in the Unified Plan. To avoid confusion, the Prince William Sound ACP should confirm that the boundaries remain consistent with the previous SCP boundaries.	As mandated by the NCP, the areas reflect and align with the USCG COTP zone boundaries. The subarea boundaries, which were defined in 18 AAC 75.495, now define the geographic zones. The geographic zone boundaries do not necessarily align with the COTP zone boundaries, nor is it necessary that they do. The division of the area plans by geographic zone allows for information organization over the rather geographically-expansive Alaska areas.  Example: Inland/coastal boundaries do not have a correlated geographic zone boundary. Specifically, within the AWA area, a map of the deviation in boundaries between the Cook Inlet and PWS geographic zones and the AWA\PWS areas has been provided in the AWA ACP Chapter 1000.
2.	Several commenters suggested: Identify PWSRCAC as having member entities in the AWA Area. Add language to the ACP to acknowledge CIRCAC interests in Kodiak geographic zone.	PWSRCAC also has member entities in the Cook Inlet region – including the Cities of Homer, Kodiak, and Seldovia, the Kenai Peninsula Borough, Kodiak Island Borough, Kodiak Village Mayors Association (representing City of Ouzinkie, Port Lions, Kodiak Island Borough, City of Kodiak, City of Old Harbor, City of Larsen Bay, and Karluk Tribal Council), and Port Graham Corporation.	Language was added to Each of the ACPs will now reference a statewide ACP Contact Directory and the Alaska Community Database Online including stakeholders such as the RCACs. This provides efficient streamlined and centralized community contact to be available, facilitating access to the most current data.  The ACP provides multiple links to the References and Tools page where the ACP Contact Directory is available for statewide use and a centralized database for contacts.  It is not in the purview of the ACP to maintain RCAC’s list of member entities but relies upon incident-activated stakeholder participation.
3.	Once commenter suggested changing the Regional Stakeholder Committee description.	The description for the Regional Stakeholder Committee has been changed from the current plan. This was supposed to be a “cut and paste.”	In the final version of the RCP, the definition of the RSC matches that which was in the superseded Unified Plan. In the ACP, the regional stakeholder committee includes procedures from the most descriptive within the area’s geographic zone. Be advised that the procedures may be updated by the area committees to add flexibility and broad applicability to other geographic zones area-wide.
4.	One Commenter noted updates were needed to Agency POCs.		Agency contact information has been centralized to one database for agency and response personnel that is maintained statewide by all area committees, reference the ACP Contact Directory.

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5.	One commenter noted under V.1 Permits – Fish Resource Permit. The permit name has changed from Fish Resource Permit to Aquatic Resource Permit and the link is the same as Fish, Amphibian, & Aquatic Plants Permits	Delete the line: Fish Resource Permit application: <a href="http://www.adfg.alaska.gov/index.cfm?adfg=fishingCommercial.main">http://www.adfg.alaska.gov/index.cfm?adfg=fishingCommercial.main</a>	Needed wildlife and habitat permits and authorizations are described within the Alaska Wildlife Protection Guidelines available on the ADEC References and Tools webpage.
6.	One commenter stated that in Version 1 Section 2340.2 – Fact Sheet, Spill Investigation Activities & Sampling, 2nd paragraph. Change “Field water chemistry activities conducted by ADF&G” to “ADEC” or “ADF&G and ADEC”.	This portion of the response seems like it should fall under the purview of ADEC Division of Water. ADF&G has some water quality testing equipment that could be deployed but ADEC has jurisdiction over water quality issues.	This fact sheet has been removed from the 2018.1 Version as it was outdated. Future fact sheets will be vetted and adopted by the Area Committee.
7.	One commenter suggested deletion of V.1 repetitive language in 5210.2.4 ADF&G Vessels.	The same information is repeated.	This information has been updated in Section 5110.
8.	One commenter suggested an update to V.1 Section 5220.9 Fish and Wildlife Response Facilities and Resources – ADF&G, Section 9220 State Resources/Agencies – ADF&G, and updates to other Wildlife agency contacts throughout the plan.	Change to: 267-2342 (Anchorage) 459-7289 (Fairbanks)	The Alaska Wildlife Protection Guidelines, available on the ADEC References and Tools webpage, provides a centralized location for federal, state, and private wildlife protection and response contacts, resources, and procedures. Additional statewide response related contact information is available in the ACP Contact Directory.
9.	One commenter recommended noting that GRS, while important, do not represent all of the sensitive areas in a State as large as Alaska.	Ensure the reader recognizes both the importance and limitations of GRS.	The AWA ACP language regarding GRS has been amended to read: “The GRS provided do not address the exhaustive number of sensitive areas and priority protection sites within the AWA. During an incident, as in an exercise, the RP/PRP and IMT should consider all potentially sensitive areas that may be impacted for strategies to mitigate and protect valued resources and habitat.” Section 9720 – Geographic Response Strategies.
10.	Comments were received regarding needed clarification on USCG / EPA jurisdictional authority involving large navigable rivers and recommended listing the rivers and add text describing where jurisdiction changes.		Additional clarifying text has been added to Section 1210 and 1220 to clarify the AWA area boundaries and related jurisdictional authorities.  The MOU between the USCG and EPA is available in the Alaska Regional Contingency Plan (RCP).

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11.	Several comments noted a need to update the ACP map boundaries to delineate the FOOSC jurisdictional boundaries for USCG and EPA and to remove geographic zone boundary lines that extend inland and outside the scope of the ACP.	Maps used in the ACP need to be accurate.	Descriptive narrative has been added for the jurisdictional boundaries.  A map scaled to be useful in this regard for an area as expansive as the AWA would be ineffective. Reference discussion in Chapter 1000.
12.	One commenter recommended referencing the <i>Memorandum of Agreement Between the Bureau of Safety and Environmental Enforcement - U.S. Department of The Interior and the U.S. Coast Guard- U.S. Department Of Homeland Security BSEE/USCG MOA OCS-03</i> Effective Date: January 18, 2017.	This MOA outlines USCG and BSEE responsibilities. Link: <a href="https://www.bsee.gov/sites/bsee.gov/files/interagency-agreements-mous-moas//signed-moa-ocs-03-oildischargeplanning-18jan2017.pdf">https://www.bsee.gov/sites/bsee.gov/files/interagency-agreements-mous-moas//signed-moa-ocs-03-oildischargeplanning-18jan2017.pdf</a>	Agency authorities, including BSEE's are covered in depth in the Alaska RCP. Scheduled for review by the ARRT in the winter of 2019/2020, the MOA is anticipated to be incorporated into the next version of the RCP.
13.	The Alaska RCP in APPENDIX III: ARRT DISPERSANT USE PLAN FOR ALASKA (DUPA) contains uniform policy for dispersant use within the State. Providing different policies within the ACPs would cause confusion.		The ARRT Dispersant Use Guidelines contained in the Alaska Regional Contingency Plan are managed by the ARRT consistent with NCP guidance. These documents are not within the authority of the Area Committee to revise or alter.  Checklist and application forms from the DUPA may be pulled for easy access for response team use but are not to be altered by the Area Committee. Links to these documents are available on the Area Plan References and Tools webpage.
14.	One commenter suggested adding text discussing the process for identifying dispersant use avoidance areas, which were previously conducted during subarea contingency plan updates.	The DUPA and ARRT separate guidance document <i>ARRT- Development of Dispersant Pre-Authorization Area Exclusion Zones (A.K.A. Dispersant Use Avoidance Areas</i> discuss this issue.	Links to the dispersant use avoidance areas within the AWA have been provided on the AWA ACP webpage. Language has been added within Section 3260 to point to these documents.
15.	Multiple comments were received requesting additional information be included to describe in more detail the general purpose of Area Committees, incorporating USCG policy, adding area committee stakeholders.	Comments received included: It is unclear why Section 1320 – Purpose is TBD (To be Determined). The National Contingency Plan, and presumably other sources, describe the general purpose of Area Committees. Section 1300 of the ACP also has some relevant language.	Section 1320 has been deleted. Additional information is available in Section 1100 and 1300. Additional information is available in the Alaska RCP .Part Two – Guidance to Area Planners – referenced within throughout Chapter 1000.

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		<p>The following language is confusing. “For a list of agencies and participants in the Arctic and Western Alaska Area Committee, Reference documents created by that area committee.”</p> <p>1330 - Recommend adding excerpt from USCS policy on who are able to participate. Also provide a citation (and link) for the applicable USCG policy.</p> <p>1310 - Recommend adding Area Committee stakeholders.</p> <p>1330 – Recommend revising the second sentence of 1<sup>st</sup> paragraph.</p>	<p>It is also intended that each Area Committee shall have a webpage to post their ACP with pertinent Area Committee activity information. The vision for each of Alaska’s ACP is to keep the plan streamlined to facilitate responder performance. Incorporating Area Committee administration or tasks, while important, would diminish the effectiveness of the ACP in this regard.</p> <p>The AWA Area Committee has developed charters, available upon request and posted on the Area Committee webpage, which explains the functions of the committee’s subcommittees and defines the members / members at large etc.</p>
16.	<p>One commenter suggested that the role of the ARRT should be modified: <i>A formal "convening" of the ARRT during a spill event will only be necessary for dispute resolution or major policy issues affecting multiple agencies.</i></p>	<p>The NCP (§ 300.120) discusses incident-specific activation of the RRT. The RRT can be activated at the request of the OSC or RPM, or a RRT member. Examples include assisting the OSC by providing resources, assisting with preparing press releases, providing informational briefings for RRT members, etc.</p>	<p>Please see rewrite in Section 1430 Regional Response Team Structure. The commenter’s CFR Section citation has been included within the References and Tools.</p>
17.	<p>One commenter recommended mentioning that the USCG Incident Management Handbook (IMH) is available as a phone application.</p>	<p>The IMH is also available as an Apple and Android “app.” The app version is convenient and searchable.</p>	<p>Additional language has been incorporated within section 1440.1 to read: “Available as a downloadable phone application that is searchable, the guide provides detailed guidance for each identified ICS position for emergency response operations. ”.</p>
18.	<p>One commenter noted: The ACP states: “Below the command level, positions within the ICS can be filled by employees of the RP (recommended) or its independent contractors” and “Government agency personnel may supplement ICS staffing as necessary.” Is this preference for filling ICS positions based on specific laws, regulations, or policies vs. common practice? Also recommend discussing the OSC’s obligation to direct the response when there is a substantial</p>	<p>The NCP states that “If the discharge results in a substantial threat to the public health or welfare of the United States (including, but not limited to fish, shellfish, wildlife, other natural resources, ... the OSC must direct all response efforts.” The statement in the ACP seems at odds with the language, or at least additional discussion is warranted.</p>	<p>Additional cross-reference to the relevant RCP sections have been provided. Responsible Party Response Policies have been referenced within the Alaska RCP. Section 1440.5 reiterates the obligations of the RP/PRP. Facility owners have an obligation to respond, which includes a trained and capable IMT.</p> <p>Section 1450 discusses the government role during a response. Again, further discussion is available in the RCP Part Two – Guidance to Planners, Section B.</p> <p>The ACP language in question is consistent with NCP guidance and the obligations of the RP.</p>

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	threat to the public health or welfare of the United States.		
19.	One commenter recommended: Sections 1500, 1600, 1610, 1620, and 1640.3 are all “TBD.” These sections need to be addressed during the first ACP update.		Section 1500 – State/Local Response System has been updated to include an overview of Alaska’s state and local response systems. As this policy content and not subject to Area Committee changes, it is most appropriate as a summary in the ACP with cross-reference to the Alaska RCP. The existence of the Alaska RCP allows the ACPs to focus on and streamline actionable response-related information. Policy discussions and instruction materials may be cross-referenced to the Alaska RCP, especially since these are not within the purview of the Area Committee to modify. The Alaska RCP is also the most appropriate place for high level discussion of the National Policy and Doctrine. Section 1610 and 1620 have been deleted for the same reason.
20	One commenter recommended that information on bioremediation (Section 1640.3) be addressed during the first ACP update.	Reminder for the Area Committee.	This section was deleted in Version 2018.1. This issue needs further development within the Area Committee(s).
21	One commenter recommended reference to the national <i>Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act’s National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act</i> , rather than referencing the Regional Plan.	Section 1650.3 of the AWA ACP Version 2018 – Endangered Species Act (ESA) references a USFWS website, which provides general information on the ESA. It does not, however, reference the national ESA MOU between the USCG, EPA, Fish and Wildlife Service, and the National Marine Fisheries Service.	This section was deleted within the AWA ACP. Appropriate information has been expanded within the Planning Section of the ACP, Section 4850. The MOA is acknowledged within this section and additional direction provided.
22	One commenter recommended replacing the 2018 AWA ACP website link to the FEMA site that describes the NHPA and the “regular” Section 106 consultation process with reference to the national <i>Programmatic Agreement on Protection of Historic Properties During Emergency Response Under the National Oil and Hazardous Substances Pollution Contingency Plan</i> .	The FEMA website has information on the normal project-oriented NHPA Section 106 consultation process. During an emergency response we follow the national PA and the Alaska implementation guidelines, found in Appendix V of the RCP.	Section 1660 has been deleted. Information and references to the Alaska Implementation Guidelines for the Protection of Historic Properties and the NCP Programmatic Agreement are captured in Section 4870 – Historic and Cultural Properties Protection Consultation.  A reference to the Alaska RCP, Appendix V: Historic Properties Protection Guidelines for Federal On-Scene Coordinators has been added in Section 4870. The PA has also been referenced under the Cultural Resources & Historic Properties heading on the References and Tools webpage.

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23	One commenter suggested edits to AWA ACP Version 2018 Section 2130.2 – Hazmat stating recommending the expansion of the discussion beyond response to toxic gasses.	Hazardous materials release may also include substances that could be spilled during truck rollovers, train derailments, vessel groundings, facility accidents, etc. Highlighting the importance toxic gas releases is understandable; however, it is unclear why other potential sources are not addressed. Section 7000 – Hazardous/Radiological Substances provides more comprehensive coverage of this topic. Section 2130.2 should be consistent with Section 7000.	<p>This section on establishing response objectives has been revised, streamlining the job aids to more expansive discussion within the agency incident management guides and handbooks.</p> <p>The Hazmat Section 7000 centralizes information on hazmat response in Alaska with appropriate references and tools established through hyperlink to the Area Plan References and Tools.</p>
24	One commenter suggested that Version 2018 of the AWA ACP Section 2140.1 - Federal Response Action Priorities/Strategies be revised.		This Section has been revised to cross-reference established agency guidance for establishing response objectives.
25	One commenter recommended adding a link to shoreline type and shoreline ranking within Version 2018 of the AWA ACP on federal response action priorities/strategies	The text states that “Selection of the proper shoreline cleanup technique depends on many different factors.” It then lists five criteria. Recommend adding both shoreline type and shoreline ranking. The ranking system comes from NOAA Environmental Sensitivity Index maps.	<p>Section 2140.1 has been deleted and a cross-reference to the USCG IMH has been provided to assist the FOOSC in establishing the incident-specific priorities and objectives.</p> <p>The subject information is provided in section 4630 under the Environmental Unit and cross-references to the Area Plan References and Tools webpage with a direct link cited on that page to the relevant NOAA documents.</p>
26	One commenter recommended revising the Second Paragraph on page 39 of the 2018 AWA ACP to correct the paragraph’s discussion of the process for approving the use of shoreline cleaning methods to mention the roles of the EPA, the State of Alaska, and the natural resource trustees (DOI and DOC).	This paragraph isn’t completely accurate as there is no role for the entire ARRT, the EPA is not mentioned, etc. In describing the approval process for shoreline cleanup products, the ACP states that “...the product must be listed on the NCP Product Schedule, and authorization must be obtained from the ARRT and the OSC of the spill.” According to the NCP: the “OSC, with the concurrence of the EPA representative to the RRT and, as appropriate, the concurrence of the RRT representatives from the states ... and in consultation with the DOC and DOI natural resource trustees, when practicable ... may authorize the use of dispersants, surface washing agents, surface collecting agents, bioremediation agents, or miscellaneous oil spill control agents.”	<p>To ensure statewide consistency, approval and implementing protocols for the potential use of Schedule J chemicals – to include delineation of approval authorities – is more appropriately addressed by the ARRT.</p> <p>The issue of approval protocols for the use of Schedule J chemicals will be communicated by the Area Committee to the ARRT.</p>

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27	One commenter suggested adding text on Page 39 of the 2018 AWA ACP to note that trustee agencies can assist the OSC with evaluating many of the eight factors to be considered when determining if shoreline cleanup is an appropriate response	Trust resource agencies have considerable expertise in topics including potential for habitat damage, wildlife disturbance, oil toxicity, oil degradation, etc.	This section was deleted from the Command Chapter and more appropriately incorporated into the Environmental Unit Section of the Planning Chapter. See Section 4630 within the 2018.1 AWA ACP.
28	One commenter suggested the removal of information regarding media outlets that are located outside of the ACP boundaries.	The ACP provides contact information for media outlets in communities that are outside the ACP boundaries. These include, but are not limited to Talkeetna, Fairbanks, North Pole, etc. This will be confusing for responders, particularly those who are new to the area. This information belongs in the Alaska Inland Response Plan.	All contact numbers have been removed for media contacts in the PIO Section of the 2018.1 AWA ACP.
29	One commenter recommended that the 2018 Version of the AWA ACP Section 2420 – Federal/State/Local Trustees be revised.	Recommended alternative language will improve responder awareness of resource concerns beyond ESA listed species and critical habitat.	The AWA ACP language has been streamlined to remove extraneous narrative. The role of the resource trustees is integrated in the 2018.1 Version of the AWAACP.  Policy information related to the role of the trustees is also available in the RCP.
30	One commenter suggested revised language for the Natural Resource Damage Assessment (NRDA) language in the 2018 AWA ACP.	Revised text is more descriptive and accurate.	New language has been incorporated into the Version 2018.1 AWA ACP. Reference language Section 2500 – Natural Resource Damage Assessment and Restoration (NRDAR). This information was incorporated from language provided to the agency planners by the NRDA agency coordinators.
31	One commenter recommended including the link to the Most Environmentally Sensitive Area (MESA) maps, located on the Alaska Department of Fish and Game website: <a href="http://www.adfg.alaska.gov/index.cfm?3Fadfg%3Dmaps.mesamaps">http://www.adfg.alaska.gov/index.cfm?3Fadfg%3Dmaps.mesamaps</a>	Providing the web link will save responders time.	Links to maps that may be useful to responders are available on the Area Plan References and Tools webpage.
32	One commenter recommended removing references to medical facilities that are not included within the ACP.	It may be confusing to include these inland locations that are outside the boundaries of this ACP.	Links have been provided on the Area Plan References and Tools webpage to the DCRA Community Database online. This is a comprehensive Geo-referenced database that may be queried by specific community.

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33	One commenter recommended updating the link to the Wildlife Protection Guidelines for Alaska:	The link provided is no longer functional.	One link has been established to the Wildlife Protection Guidelines for all of the Area Contingency Plans to reference. The link is cross-referenced within the AWA ACP to the Area Plan References and Tools webpage.
34	One commenter recommend moving subsistence maps to an alternate location. Also recommend including the web links to these maps, or at least the website where original copies can be accessed.	This map series is placed within a section of the ACP dealing with currents. These data are very important and should be included in the ACP, but not in this section. The original maps will likely be at higher resolution than the ones found in the ACP.	Multiple mapping links have been consolidated on the Area Plan References and Tools webpage for incident-specific meteorological and oceanic information.  The original current information referenced in the comment is available within the background information <i>Alaska Oceanographic Circulation Diagrams and Graphics</i> (PDF 48M)
35	One commenter suggested the removal of the “Oil Spill Response Checklist: Wildlife Capture, Transportation, Stabilization & Treatment ARRT” and “Oil Spill Response Checklist: Wildlife Hazing ARRT.”	Inaccurate information. A separate table <i>Wildlife Resource Agency Permits and/or Authorizations Required for Deterring, Collecting, or Holding Wildlife</i> is attached.	A new version of the Wildlife Protection Guidelines including permitting obligations and procedures is in process by trustee agencies and resource management authorities. The WPG revision and update is projected to be completed Winter of 2019/2020. The ACP cross-references to the Area Plan References and Tools, which currently includes the WPG for Alaska. Upon finalization of a new version of the WPG, the document will be updated for a centralized reference for all of Alaska’s ACPs.
36	One commenter recommended the removing the reference to Zones 1, 2, and 3 when referencing the “Dispersant Use Application”	Zones are no longer included in the DUPA.	The dispersant use information has been updated throughout the plan.
37	One commenter recommended multiple changes related to wildlife protection and permitting: <ul style="list-style-type: none"> <li>• Remove “Marine Mammal Protection Act Instructions – NMFS” and “NMFS Endangered Species Act Permits - NMFS.”</li> <li>• Remove “CITES/ESA Take Permit DOI-FWS; Endangered Species Act Permits DOI-FWS; Marine Mammal Protection Act Permit DOI-FWS; Bald and Golden Eagle Protection Act Collection Permit DOI-FWS; Migratory Bird Treaty Act Collection Permit DOI-FWS; Migratory Bird Treaty Act Rehabilitation Permit</li> </ul>		Information on the required permitting authorities and obligations for wildlife protection during a response are most appropriately addressed within agency drafted guidelines. The Wildlife Protection Guidelines are currently being updated by the relevant agencies with the necessary expertise through the ARRT Wildlife Committee.  Upon completion, these guidelines will be available via a link on the Area Plan References and Tools webpage for consistency statewide. Until then a link to the current guidelines is provided on the References and Tools webpage.



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	<p>DOI-FWS; Migratory Bird Treaty Act Special Purpose Salvage Permit DOI-FWS.”</p> <ul style="list-style-type: none"> <li>• Insert <i>Wildlife Resource Agency Permits and/ or Authorizations Required for Deterring, Collecting, or Holding Wildlife</i> table (attached)</li> </ul>		
40	<p>One commenter recommended that Section 4860 – ESA Consultations in the 2018 Version of the AWA ACP be updated by: providing a link to the national <i>Inter-agency Memorandum of Agreement Regarding Oil Spill Planning and Response Activities Under the Federal Water Pollution Control Act's National Oil and Hazardous Substances Pollution Contingency Plan and the Endangered Species Act</i>. Recommend including the link in this plan, rather than referencing the Regional Plan.</p>	<p>The ACP provides links to general ESA consultation guidance, which may provide useful background for responders. These do not, however, cover the emergency Section 7 consultation procedures used during an incident.</p>	<p>This section has been changed to Section 4850.</p> <p>Revision of the section provides for new language including cross-referenced information on the Area Plan References and Tools webpage. The webpage includes a section specific to ESA Compliance under Sensitive Areas, Protected Species, Fish and Wildlife.</p>
41	<p>One commenter suggested clarification in Section 5210.1.2: USCG - CGC Munro is listed under WMEC when in fact it is a WHEC. Previous paragraph on WHEC is inaccurate, MUNRO is stationed in Kodiak. <a href="https://www.pacificarea.uscg.mil/Our-Organization/Cutters/cgcDouglasMunro/">https://www.pacificarea.uscg.mil/Our-Organization/Cutters/cgcDouglasMunro/</a> and according to USCG, the official name is CGC Douglas Munro.</p>	<p>Inaccurate statement.</p>	<p>This change, while made in Version 2018 of the AWA ACP, has subsequently been deleted in Version 2018.1 of the AWA ACP.</p>
42	<p>One commenter requested additional information for State resources listed under 5210.2.3 - Is there a name of the state ferry designated as the "response" ferry?</p>	<p>Adds clarity to sentence.</p>	<p>State and Federal agency assets need to be validated and updated by the Area Committee. This information has been communicated to the Area Committee to address in future plan updates.</p>

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43	One commenter suggested changes and updates to multiple Sections within Chapter 9000 that included telephone numbers, POC updates, and language modifications.	Update of contacts and language clarification	<p>Most of the comments recommending updated contact information within Chapter 9000 were addressed during the 2018 Version of the AWA ACP.</p> <p>Maintenance of contact information for agencies and stakeholders is a statewide planning effort. Agency planners are working to consolidate response and community contacts onto the References and Tools. This allows multiple Area Committees to contribute resources for the maintenance of this information.</p> <p>Comments that follow demonstrate agency planner efforts to address comments received for Chapter 9000 during the public review of the 2018 Version of the AWA ACP.</p>
44	One commenter recommended updating information for Bird Treatment and Learning Center: Point of Contact: Guy Runco	Current contact.	Contact was updated in Version 2018 of the AWA ACP.
45	One commenter recommended changes to Section 9730.2.2 – Local Contacts: Remove information for communities not within the ACP boundaries (i.e., inland communities). These changes apply to many other sections of the ACP. Please update the entire plan accordingly.	Avoid confusion for responders and avoid duplication among plans.	<p>There are now multiple references that may be used to gather information on community contacts. The primary tool for locating community and agency contacts is cross-referenced within Chapter 9000 under the lead in for the chapter: including the Contact Database and the DCRA’s Alaska Community Database. This information is available under the Overview Documents on the Area Plan References and Tools webpage.</p> <p>Section 9730.2.2 has been changed to 9750.</p> <p>Section 1220.1 provides a link to the ACP Community by Area Committee database to determine relevant community inclusion in an Area Committee and ACP applicability.</p>
46	One commenter recommended that that Section 9750 – Potential Places of Refuge: Recommend emphasizing that while pre-identified sites may be helpful, the <i>Guidelines for Places of Refuge Decision-Making</i> should be followed when making these decisions. Depending on the incident, the pre-identified sites may or may not be appropriate.	Emphasize the importance of following the Guidelines when making these decisions.	Section has been changed to 9730. – Potential Places of Refuge. Additional information has been provided to direct the responders to Appendix 1 of the guidance.

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47	One commenter suggested adding headers to the “Community Profiles:” in Chapter 9000.	This clarifies to readers what is contained in the section.	The community profile section now points to the DCRA Community Database Online – a mapping tool and the Contact Database to access community-specific information. This database is maintained by DCCED on an annual basis and provides the most up to date information for the purposes of a response anywhere in Alaska.
48.	Several comments received noted redundancy and extraneous narrative. stated:	<ul style="list-style-type: none"> <li>• The supplemental information that the ARRT published along with the revised plan versions makes it clear that the RCP is intended to be used in the planning context and the ACP in the response context. While this delineation makes sense, we believe that there is a lot of information that is still contained in the ACPs that might belong in the RCP. In reviewing both the 355 page PWS ACP and the 959 page AWA ACP, we found that many sections are repeated verbatim in both ACPs. These documents might be more readily usable during a response if some of this general information were moved to the RCP and printed in just one place instead of across 4 different ACPs. This might also reduce the amount of time required for future updates. ACPs could point to RCP information in these instances.</li> <li>• The new format for the ACP, which follows the numeric approach in other parts of the U.S., makes sense and is reasonably easy to use and follow. The use of hyperlinks within the document makes navigation a bit easier, although there still seems to be a lot of redundancy. Technical information (particularly in Sensitive Areas sections) is up-to-date in some cases and outdated in others. The approach of having long text sections on this type of data – which could also be accessed through geospatial databases or portals like Arctic ERMA – is something that should be considered as the ARRT works on the contents of these plans. It is hard to imagine how these static, paper-based sections would be utilized during a spill response.</li> </ul>	<p>Agency planners concurred with comments regarding repetitive content in the state’s ACPs. Since much of this information is response focused – it is inappropriate to incorporate it into the RCP.</p> <p>Alternative measures were established to consolidate information to support statewide response as well as area specific response information.</p> <p>A concerted effort was expended to identify statewide applicable information that all of the area committees may reference. This information is available on the Area Plan References and Tools webpage.</p> <p>Area-specific response information is to be made available on each Area Webpage.</p>

**ARCTIC AND WESTERN ALASKA AREA CONTINGENCY PLAN VERSION 2018.0, RESPONSE TO COMMENT**

No.	Comment	Additional Comment or Rationale for Recommended Change	Agency Response to Comment
49.	<p>One commenter noted that: the superceded Unified Plan includes a detailed description of the update process. The information published by the ARRT states that standing Area Committees will manage the finalization of ACP contents and updates moving forward; however, it is unclear what the process will be for finalizing RCP contents and triggering/reviewing future updates. It is important that public review opportunities are retained for both processes</p>		<p>There are multiple ways stakeholders and the public may provide input into the ACP content, which is managed under the direction of the federal and state OSCs. Area Committees also provide the most expedient way to voice concerns and participate in the resolution of related issues. Stakeholders are encouraged to participate in their Area Committee. Information on the Area Committee is contained in Section 1300 of the ACP. Additional information is available on the AWA ACP webpage found here: <a href="https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/arctic-western-area/">https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/arctic-western-area/</a>.</p> <p>The AWA AC welcomes agencies, stakeholders, industry, and organizations to participate in the planning process for responding to oil discharges and releases of hazardous substances.</p> <p>The State of Alaska also has a statutory obligation to provide a public review period for the State Master Plan under AS 46.04.200.</p>