

AWA ACP version 2018.1 Response to Comment

#	Point of Contact	Organization/ Commenter	Section #	Page #	Specific Wording Change	Rationale for Recommended Change	Response to Comment Language
1	Phil Johnson	DOI/OEPC	1000	1-3	A link appears to be missing from the ACP. The text is highlighted in blue and underlined but not linked?	Direct reader to relevant information.	Hyperlink Issue. ACP was revised per recommendation.
2	Steve Russell	152 Degrees West Environmental Services LLC	1000	1-3	Alaska's federal and state government response planning obligations are met through the Alaska RCP and four ACPs. The RCP contains planning and response role and policy information that in other areas of the nation would most likely be contained in an ACP. This information may be succinctly repeated in Alaska's ACPs when emphasis is desired, but the primary location of this information is contained in the RCP.	The Alaska Regional Plan, approved 08/2018, was not made available for review by the State Emergency Response Commission or open for public comment as required by AS 26.23.077(a) and AS 26.04.200(c)(2) before approval, and references to a un-reviewed plan should be questioned by the OSC's.	The RCP along with the four ACPs was submitted for public review in June 2018. That review period was limited to plan format. The RCP is scheduled for revision, including public comment period, Winter-Summer 2020. Comment referred to Area Steering Committee and Alaska Regional Response Team.
3	Steve Russell	152 Degrees West Environmental Services LLC	1000	1-4	authorities are found within AS 46.04.200, AS 46.04.210, and AS 26.23.075.	last statute reference is listed in correctly	ACP revised per recommendation
4	Linda Swiss	PWSRCAC	1000	1-3	Consider adding link to RCP.	Ease of use	A References and Tools box has been added to the top of Page 1
5	Charlene Saclamana	Kawerak, Inc.	1000	1-3	Intended to support individuals that fill a role	Individuals cannot successfully fulfill a role they are not trained on. They would be heavily reliant on the FOSC, SOSC, no community oil spill or hazardous substances plans exist. We are aware of this. Is this the right venue to point out that oil spill training and oil spill planning cannot occur without first, trained individuals?	Local Emergency Plannig Committees are responsible for assisting with development of community response plans. LEPCs may also be a resoruce to identify training opportunities. Additional training opportunities may be available through EPA's IGAP and Brownfield programs. Comment referred to the Area Steering Committee.
6	Charlene Saclamana	Kawerak, Inc.	1000	1-3	No Change	Consider mailing out references and tools to utilize, see comment 1.	This comment will be referred to the Area Steering Committee.
7	Charlene Saclamana	Kawerak, Inc.	1000	1-3	ACP contact needs to reflect accurate information, six villages are not listed in ACP contact list	Need to reach out to tribes and regional partners willing to work with AWA committee	Please email any additions/corrections to lsanden@ene.com

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8	Charlene Saclamana	Kawerak, Inc.	1000	1-3	Overall plan	Overall plan or stakeholders involved in creating this document should be cognizant of the capabilities of the communities statewide. Financial resources and technical assistance are needed in the areas of oil spill response planning. Annual plans for training should be implemented. Has DEC/USCG conducted regional meetings at local "hubs" to inform communities of the area plan, training necessary, local plan development, exercising the local plan in the smaller communities?	With respect to the Arctic Western Alaska Area Contingency Plan, ADEC and USCG have implemented both webconference and teleconference access to all Area Committee Meetings. A webinar was also held to facilitate plan familiarization. Development and exercise of local response plans as well as responder training is beyond the scope of the ACP. Refer to AWA ACP Section 1000, Introduction for more information on the AWA ACP.
9	Leslie Pearson	Pearson Consulting LLC	1000	1-5	Figure 1-1: Revise box for Coop Resources and Information to OSRO/PRAC Resources.	These organizations aren't Coops.	The figure was revised
10	Leslie Pearson	Pearson Consulting LLC	1000	1-14	Change, "During an RP/PRP driven response to managed response.		Changed to "During a RP/PRP lead response..." to be consistent with the NCP and other agency guidance
11	Vinnie Catalano	CIRCAC	1000	1-3	Name the 4 area plans	Improve clarity	ACP was revised per recommendation.
12	Vinnie Catalano	CIRCAC	1000	1-3	The ACP contains planning and response role and policy information that may be succinctly repeated in the RCP to provide broader guidance	Purpose of plan re-write is to bring Alaska into alignment with other areas, so stating that it is different is confusing.	ACP was revised per recommendation.
13	Vinnie Catalano	CIRCAC	1000	Table 1-1	Recommend more specific wording to help the user locate the exact reference as titled on the ADEC website listed above.	The DEC website lists useful information but the terminology doesn't match what is listed here. Perhaps using the same categories and titles listed on the DEC website would allow users to immediately go to the reference or tool they are seeking.	ACP was revised per recommendation. Management of the References and Tools is an on-going process.
14	Vinnie Catalano	CIRCAC	1000	1-3	Ensure hyperlinks take user directly to resource whenever possible	Enhance ease of use	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
15	Jeanette Alas	ADF&G	1100	1-5	Recommend adding ODPCP to Figure 1-1 under "Industry Response Plans".	ODPCP requirements are in State statute and regulations. They are an important tool for oil spill prevention and response planning and a good example of state mandated industry response plans.	ACP was revised per recommendation
16	Leslie Pearson	Pearson Consulting LLC	1100	1-4	Although this paragraph discusses the identification of assess shortfalls and weaknesses... there is no mention in the AWA ACP of industry shortfalls and need for an alternative planning criteria throughout this area of operation.	There's a need for the Coast Guard to recognize APC's are necessary in the AWA zone, what the shortfalls are and how they've historically been addressed as well as how they will be addressed in the future. This is not only a CG issue but APC issue that needs to be recognized and discussed.	APCs are a USCG managed program, to facilitate compliance with the national planning criteria associated with USCG-mandated VRPs. Future iterations of the AWA ACP will address how the Area Committees manage their interaction with the APCs.

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17	Vinnie Catalano	CIRCAC	1100	1-4	Add language to paragraph to note that the RCP/ACP is also the guidance and reference document for Federal and State/Local agencies to monitor response activities as responsible parties execute their response operations. And that the RCP/ACP becomes the primary guidance document for agencies when the responsible party is not or cannot adequately execute their response plan as noted in 1440.5 – Responsible Party (RP/PRP) Policy.	Emphasize RP responsibility to execute an effective and appropriate response.	ACP was revised per recommendation
18	Vinnie Catalano	CIRCAC	1100	1-4	add "the" before "area" and capitalize "Area"	Correct grammar and make clear that this refers to the area covered by this plan	ACP was revised per recommendation
19	Vinnie Catalano	CIRCAC	1100	1-4	Suggest adding hyperlinks to referenced statutes	Enhance ease of use	ACP was revised per recommendation
20	Phil Johnson	DOI/OEPC	1200	1-7	N/A	New map(s) are useful. In our July 2018 comments, DOI noted the need for a revised map that better depicts the Area boundaries. Thank you addressing this previous comment.	Please refer to the References and Tools Website, see: Communities by Area Committee table, for additional guidance on which communities are located within a specific Area. No action taken.
21	Vinnie Catalano	CIRCAC	1200	1-5	Reword to make clear EPA has MOU with USCG, not with a document	Improve clarity	ACP was revised per recommendation
22	Vinnie Catalano	CIRCAC	1200	1-5	Remove extraneous "and" before "inland"	Improve clarity	ACP was revised per recommendation
23	Linda Swiss	PWSRCAC	1210	1-5	Edit to clarify that MOU is between EPA and USCG. Include link to MOU.	Clarity and ease of use	ACP was revised per recommendation
24	Linda Swiss	PWSRCAC	1210	1-5	Consider moving sentences "Alaska is divided into the Inland zone and the Coastal zone. The Inland zone generally includes all non-coastal land and waterways, 1,000 yards and inland of the waters subject to the extent of the tide, with exceptions from this general rule noted in the MOU. " to the beginning of paragraph.	Enhance clarity.	ACP was revised per recommendation
25	Linda Swiss	PWSRCAC	1210	1-5	Add reference to Figure 1-2 in text.	Stylistic edit suggestion	An intext reference is in Section 1210, Geographic Plannig Boundaries.
26	Linda Swiss	PWSRCAC	1210	1-7	Consider adding inset to Figure 1-2 to make clear the areas shown in Figure 1-3 show.	Enhance clarity	Comment referred to Area Steering Committee.
27	Jeanette Alas	ADF&G	1210	1-7	Recommend increasing font size of the legends for Figures 1-2 and 1-3.	The legends are difficult to read when page view is set to 100%.	Larger scale maps are available, as hyperlinks, from the Arctic Western Alaska Area webpage. Comment referred to Area Steering Committee.
28	Phil Johnson	DOI/OEPC	1220	1-8	N/A	Another DOI comment from July 2018 pertained to eight major rivers, portions of which are within ths ACP. Thank you for providing new, very clear maps, showing these jurisdictional boundaries.	Thank you for your comment.
29	Linda Swiss	PWSRCAC	1220.1	1-8	Of the rivers listed, add in which Area Plan the river is included.	Enhance clarity for reader, especially one unfamiliar with Alaska's many rivers	ACP was revised per recommendation
30	Linda Swiss	PWSRCAC	1220.1	1-8	Fix links to "Maps of the jurisdictional boundaries at these exception" and "ARRT webpage." Where are the maps on the ARRT website?	Ease of use	ACP was revised per recommendation
31	Linda Swiss	PWSRCAC	1220.1	1-8	Fix link to "ACP Community by Area Committee database."	Ease of use	Link repaired.

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32	Vinnie Catalano	CIRCAC	1220.1	1-8	For rivers within AWA Area, suggest adding brief explanation of what the FOSC exceptions are either with small maps or table.	Make clear which of these are included in this plan and what the exceptions are regarding FOSC jurisdiction.	A list of exception rivers are included ACP Section 1220.1, FOSC Boundaries. Maps are available via References and Tools Page, See: "MAPPING and GIS".
33	Vinnie Catalano	CIRCAC	1220.2	1-9	Language seems to contradict start to subsection - suggest reconsidering	Improve clarity	No action taken.
34	Vinnie Catalano	CIRCAC	1220.2	1-9	Remove "in their geographic area of responsibility."	Improve clarity - as written it sounds like there are three teams in each area of responsibility (9 total).	ACP was revised per recommendation
35	Linda Swiss	PWSRCAC	1300	1-9	Suggest adding "Under the" at start of the first sentence.	Missing word	ACP was revised per recommendation
36	Linda Swiss	PWSRCAC	1300	1-11	Consider adding this info back into the plan: Subcommittees and Workgroups: The Area Committee selects members and provides general direction and guidance for any standing subcommittee. In addition to federal, state and local agency representatives, subcommittee participants may include facility owners/operators, shipping company representatives, cleanup contractors, emergency response officials, marine pilot associations, academia, environmental groups, consultants, response organizations and representatives from any applicable regional citizens' advisory councils.	Clarify how AC engages with other groups	ACP was revised per recommendation
37	Vinnie Catalano	CIRCAC	1300	1-10	Add "Under the" at start of sentence	Suggested grammatical edit	ACP was revised per recommendation
38	Steve Russell	152 Degrees West Environmental Services LLC	1400		Alternative Planning Criteria	Alternative Planning Criteria is a key portion of the USCG planning for the highest risk vessels within the AWA response zone. Consider adding a section to 1400 or 1600 to describe and identify APC use and enforcement.	Comment referred to Area Steering Committee.
39	Linda Swiss	PWSRCAC	1400	1-11	Correct link About the NRT. It takes you https://alaskarrt.org/PublicFiles/EPA-USCG%20Jurisdiction%20Response%20Boundary%20Maps.pdf	Ease of use	References and Tools page was revised per recommendation
40	Linda Swiss	PWSRCAC	1410	1-11	Correct link to 40 CFR 300.323 - appears to go to Nuclear/Radiological Incident Annex of NRF	Correction	References and Tools page was revised per recommendation
41	Steve Russell	152 Degrees West Environmental Services LLC	1420	1-12	Responses resulting from state-declared disasters such as; Earthquakes, Floods, National Emergency Declarations, are coordinated through the Alaska DMVA	This language can be confusing, as the state may declare a disaster from a large oil spill, but spill response operations are not "taken over" by the DMVA-EM, in addition this section is inconsistent with section 2100 of the AWA	ACP was revised per recommendation
42	Vinnie Catalano	CIRCAC	1420	1-11	remove "s" on "disasters"	Suggested grammatical edit	ACP was revised per recommendation
43	Linda Swiss	PWSRCAC	1430	1-12	For consistency, consider adding links to NCP, 40 CFR 300.115 and 300.120 (in the References and Tools insert)	Complete links	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
44	Linda Swiss	PWSRCAC	1430	1-12	The revised RRT structure section addresses the ARRT response roles, but omits the pre-incident planning and policy work. Suggest that following sentence from the previous plan be added: The ARRT provides a regional mechanism for the development and coordination of preparedness activities prior to a pollution response.	Clarify aspects of RRT role - could remove "development" if AC will play this role, but the "coordination" role of the RRT will remain important	ACP was revised per recommendation

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45	Linda Swiss	PWSRCAC	1440.2	1-13	Consider adding links to documents in box	Ease of use	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
46	Karen Pletnikoff	Aleutian Pribilof Islands Association, Inc.	1440.3	1-13	Good overview of how Tribes can engage in spill response. Is it appropriate to reference ARRT Tribal Consultation Guidelines for additional information?	ARRT Tribal Consul. Guidelines might be useful to inform about general learning/introduction to the process, but maybe lines 287 and 288 are sufficient.	The ARRT Tribal Consultation Guidelines are specific to the ARRT. Each agency, USCG and EPA, have their own policies regarding coordination and consultation. This section is intended address the role of the Tribal On-Scene Coordinantor.
47	Steve Russell	152 Degrees West Environmental Services LLC	1440.3	1-13	chances are that other members of unified command will welcome the addition of local representation.	This sentence is un-necessary and inconsistent and contradictory to the language used above.	ACP was revised per recommendation
48	Linda Swiss	PWSRCAC	1440.3	1-13	Suggest clarifying who makes this request and on what criteria will be used to approve or deny it.	Enhance clarity	ACP was revised per recommendation
49	Linda Swiss	PWSRCAC	1440.3	1-13	Given the breadth of roles expected of the TOSC, suggest clarifying how this will align with other ICS functions (including the RSC) as these contributions cut across Operations, Logistics, and Planning and are quite broad.	Enhance clarity	ACP was revised per recommendation
50	Linda Swiss	PWSRCAC	1440.3	1-14	Broken link: http://www.training.fema.gov/	Fix links	ACP was revised per recommendation
51	Jill Klein	Pacific Environment	1440.3	1-13	Ensuring that tribal needs, priorities, and concerns are reflected in the incident objectives and the decision-making of unified command, and	Local should get changed to tribal in the section on the tribal role in incident response. In most villages there is a tribal and a municipal government. Section 1440.4 refers to the local municipal government.	ACP was revised per recommendation
52	Jill Klein	Pacific Environment	1440.3	1-13	Offering tribal resrouces to support the response and helping the response be efficient and effective through tight coordination with the tribal community and government.	In a section on the tribal role, the offering of local resources is not clearly delineated to a city or tribe and in this tribal section should refer to the tribal resources that the tribe can offer as compared to municipal resources that would be for the city to offer up. The reference to coordination is unclear if it is related to internal tribal coordination or tribal coordination with others in the community such as "local" municipal government.	ACP was revised per recommendation
53	Jill Klein	Pacific Environment	1440.3	1-13	The TOSC should help facilitate effective communication between the response and their leadership at the tribal level.	Change local to tribal, as this is a section on tribal response and the use of the term "local" is broad and not easily identifiable.	ACP was revised per recommendation
54	Jill Klein	Pacific Environment	1440.3	1-13	implement a plan for keeping tribal leadership consistently informed of response activities and challenges	There is no definition of local besides local government in the definitions which is a municipal or borough government. In this section focused on the tribal role, it seems appropriate to refer to tribal leadership.	ACP was revised per recommendation
55	Jill Klein	Pacific Environment	1440.3	1-13	the tribe. It could be a tribal resource manager or other position within the tribe or whom the tribe delegates to.	In a section on the tribal role, it is confusing to suggest the person to fill the tribal role would come from community or the city, unless delegated and/or requested by the tribe to do so.	ACP was revised per recommendation

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56	Jill Klein	Pacific Environment	1440.3	1-13	, knowledge of tribal resources...	In the section on tribal role, the TOSC would need to know the tribal resources available. Again, use of local is broad and undefined.	ACP was revised per recommendation
57	Jill Klein	Pacific Environment	1440.3	1-13	If an impacted tribal government would like to participate...	The tribe is a government and should be clearly identified in this section. Local municipal government is in section 1440.4.	ACP was revised per recommendation
58	Jill Klein	Pacific Environment	1440.3	1-13	If an impacted tribal government would like to participate...their participation will be welcome. Who is filling the role of TOSC is one of the first questions asked by tribal governments prior to and during response with an activated unified command.	I am not sure there would be duplication of a TOSC as each tribe would or could have their own TOSC. There are some communities where perhaps there are multiple tribal governments and they could each have a TOSC or they would need to coordinate if one of the tribes should or could take the lead.	ACP was revised per recommendation
59	Charlene Saclamana	Kawerak, Inc.	1440.3	1-13	Tribal Role	Local Government or Tribal Role. Rationale - smaller communities that have SCERPS are developed by their tri-organization and submitted by the local government to DHS&EM	ACP was revised per recommendation
60	Charlene Saclamana	Kawerak, Inc.	1440.3	1-13	Tribal Role	Information "Please contact DHS&EM Plans section for current IC contact information by community". Rationale DHS&EM retains each communities SCERP's, which contains local community IC structure and information	ACP was revised per recommendation
61	Charlene Saclamana	Kawerak, Inc.	1440.3	1-13	Tribal Role	FOSC/SOSC's approval of local or tribal participation in incident response - is a must. Adequate and continual training is needed due to turn over at the local level. FOSC/SOSC must be willing to rely upon the capabilities of the community to be informative and cognizant of the situation	Comment referred to the Area Steering Committee.
62	Charlene Saclamana	Kawerak, Inc.	1440.3	1-13	Tribal Role	"adequate training". Please specify training requirements or see page 1-14	The ACP is not intended to provide a list of recommended and required trainings for the different roles in response. Tribal governments that are interested in building TOSC positions are encouraged to engage with FOSC/SOSCs and attend relevant Area Committee meetings. Other Agencies may also have guidance, See: OSHA Publication 3172.
63	Charlene Saclamana	Kawerak, Inc.	1440.3	1-14	Tribal Role	Specify in this area what type of oil spill response training/knowledge is required.	The ACP is not intended to provide a list of recommended and required trainings for the different roles in response. Tribal governments that are interested in building TOSC positions are encouraged to engage with FOSC/SOSCs and attend relevant Area Committee meetings. Other Agencies may also have guidance, See: OSHA Publication 3172.

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64	Vinnie Catalano	CIRCAC	1440.3	1-13	Change to "The AWA ACP does not specify who will fill the TOSC position, but that individual should be someone with a strong command of the ICS, the authority to make decisions for the tribe or community they represent, knowledge of local resources and capabilities, and the ability to commit full-time to the response."	Improve clarity	ACP was revised per recommendation
65	Vinnie Catalano	CIRCAC	1440.3	1-13	Suggest changing to: "The ARRT and the AWA Committee are directed to work with area tribes and communities to help identify a TOSC. Communities are strongly urged to work with the ARRT and/or the AWA Committee to predesignate the TOSC position. "	Use more direct language	Tribal governments that are interested in building TOSC positions are encouraged to engage with FOSC/SOSCs and attend Area Committee meetings.
66	Vinnie Catalano	CIRCAC	1440.3	1-13	Add language to clarify who makes such a request and on what basis it is approved or denied	Improve clarity	ACP was revised per recommendation
67	Vinnie Catalano	CIRCAC	1440.3	1-13	Capitalize "Joint Information Center"	Suggested grammatical edit	ACP was revised per recommendation
68	Vinnie Catalano	CIRCAC	1440.3	1-14	"Change to: ""•	Work to understand and participate in the development and testing of GRSs in their jurisdiction ""	ACP was revised per recommendation
69	Vinnie Catalano	CIRCAC	1440.4	1-14	Suggest re-wording to include RP role.	As-written it assumes there is no responsible party for the incident such as a natural disaster. Otherwise the responsible party should remain the incident commander.	RP role is discussed in 1440.5
70	Vinnie Catalano	CIRCAC	1440.4	1-14	Suggest re-wording to, "During an RP/PRP-driven response, if the regulated vessel or facility has an approved ODPCP as required under state law or an approved VRP or FRP as required under the national planning criteria, it will serve as the primary guidance document for the spill response, and the RP/PRP will designate an Incident Commander."	Improve clarity	ACP was revised per recommendation
71	Steve Pearson	DOI/BSEE	1440.5	1-14	Add "OSRP under federal law"	OSRP is similar to ODPCP but required by Federal Government for offshore facilities in the OCS.	ACP was revised per recommendation
72	Steve Russell	152 Degrees West Environmental Services LLC	1440.5	1-14	take over or supplement augment the RP/PRP's response activities	consistent with AIMS guide page 2-10 and page 34 of RCP	ACP was revised per recommendation
73	Steve Russell	152 Degrees West Environmental Services LLC	1450.1	1-15	to the Disaster Policy Cabinet State Crisis Management Team for resolution at the Commissioner level.	The Governors Disaster Cabinet is not the appropriate avenue for disputes between state agencies and the SOSC, see Section 5.0 of AIMS Guide	ACP was revised per recommendation
74	Vinnie Catalano	CIRCAC	1460	1-15	Change GUIE to GIUE	Correction	ACP was revised per recommendation
75	Vinnie Catalano	CIRCAC	1460.1	1-15	Consider the relevance of mentioning the Homeland Security Exercise Evaluation Program (HSEEP) protocols here.	Many of the area operators use HSEEP protocols to develop and track their drill exercises.	ACP was revised per recommendation
76	Vinnie Catalano	CIRCAC	1460.1	1-15	Change GUIE to GIUE	Correction	ACP was revised per recommendation
77	Steve Russell	152 Degrees West Environmental Services LLC	1460.2	1-16	For State of Alaska government plans exercise provisions, reference: AS 46.04.200(d) State Master Plan, and AS 26.23.075(a)(9)	AS 26.23.075(a)(9) requires the methods and schedules for exercising the emergency plan be included in the AWA.	AS 46.04.200(d) includes provisions for exercising ACPs. AS 26.23.075 is specific to plans developed for LEPCs an LEPDs. The AWA ACP was most recently exercised in September 2018.

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78	Linda Swiss	PWSRCAC	1460.2	1-16	Suggest adding link to AS 46.04.200(d)	Complete links	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
79	S.Russell	152 Degrees West Environmental Services LLC	1500	1-16	or Local Spill Equipment Agreements. Additional information on these are provided in RCP.	Please reference specific location within RCP	Community Spill Response Agreements and Local Resposne Equipment information is available via References and Tools webpage, Logistics Section.
80	Linda Swiss	PWSRCAC	1500	1-16	Consider adding links to documents in box	Ease of use	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
81	Charlene Saclamana	Kawerak, Inc.	1500	1-16	Community Spill Response Agreements & Local response equipment	Can this be annexed at the end of this plan? Makes sense for communities that are unable to access the internet for these documents	Community Spill Response Agreements and Local Resposne Equipment information is available via References and Tools webpage.
82	Charlene Saclamana	Kawerak, Inc.	1510	1-17	Agencies and organizations include:...	Insert, please contact DHS & EM for listing of communities have completed SCERP's	ACP was revised per recommendation. A link to DHSEM's Small Community Emergency Response Plan Page will be added to the References and Tools webpage.
83	Charlene Saclamana	Kawerak, Inc.	1900	1-17	1910- Reserved for local community SCERP		A link to DHSEM's Small Community Emergency Response Plan Page will be added to the References and Tools webpage.
84	Leslie Pearson	Pearson Consulting LLC	2000	2-1	The RP/PRPadd IC		ACP was revised per recommendation
85	Leslie Pearson	Pearson Consulting LLC	2000	2-1	The description of a Unified Command needs to be cleaned up. First of all, the RP/PRP representative will be the IC in the UC. The only time a agency representative is designated as an IC is when that agency is leading the response activities, otherwise they're designated On Scene Coordinators. The OSC position is very different than an IC. Revise throughout where referenceing RPOSC change to RPIC. Align this section with the paragraph starting on line 37-39.		ACP was revised per recommendation

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86	Mark Sienkiewicz	ExxonMobil Alaska	2100	2-1	"Add as the first bullet: In the event an RP is identified and is responding: receive an incident briefing, assess current response actions, and identify immediate response priorities. In the event an RP is unknown, conduct assessments and coordinate initial response actions."	At facilities which have approved oil spill plans, the RP is obligated to immediate respond to the spill in accordance with the plan. The RP assigns an Incident Commander. The Incident Commander assigns personnel to the ICS response positions. This RP's initial Incident Management Team is typically pre-organized and pre-designated in order to ensure maximum efficiency and effectiveness. The current language in the ACP in section 2100 implies that the IC and IMTs are not established until after the Unified Command is established. Realistically, the Unified Command is not formally established and does not meet until approximately 4-6 hours after the event. Refer to AIMS guide, figures showing response escalation, as well as line 37 and lines 186-187 of the ACP. Also important to note is the the IMT team will evolve significantly over time. Typically the IC manages the makeup and organization of the team, with UC consultation, agency integration, and ultimately UC approval through the IAP. The proposed word changes are more alligned to reflect reality in nearly all significant oil spills.	ACP revised per recommendation
87	Mark Sienkiewicz	ExxonMobil Alaska	2100	2-1	"Add red wording to second bullet (existing wording in black): Where the RP is unknown or where the RP is not adequately responding to the incident, designate the Incident Commander (who will normally be one of the Unified Commanders assigned to the Unified Command);"	Same as previous	ACP was revised per recommendation
88	Mark Sienkiewicz	ExxonMobil Alaska	2100	2-1	"Add to bullet at current line 25: The Incident Commander will designate officers and section chiefs for each section within the ICS;"	Same as previous. Note that the ICS organization chart is part of the IAP, so the Unified Command has input in org chart development process as well as final approval authority (through the IAP approval).	ACP was revised per recommendation
89	Linda Swiss	PWSRCAC	2100	2-1	Sentence removed from 2100 Unified Command in current plan: "Per the National Contingency Plan, disputes that cannot be resolved within the response structure could be elevated to the Alaska Regional Response Team for resolution, if within their jurisdiction. Disputes that cannot be resolved by the ARRT shall be elevated to the National Response Team." This issue is not addressed in this draft.	Suggest clarifying how disputes may be handled to facilitate resolution during a response situation.	No action taken. The NCP does not give the ARRT this authority. Disputes are resolved with the Unified Command. Comment referred to Area Steering Committee.
90	Vinnie Catalano	CIRCAC	2100	2-1	Clarify language to state that the RP should lead their own response if present and capable.	Improve clarity	See section 2110.5, Responsible Party Representative
91	Vinnie Catalano	CIRCAC	2100	2-1	Change to, "...resource allocation, and cleanup"	Improve clarity	ACP was revised per recommendation
92	Vinnie Catalano	CIRCAC	2100	2-1	Consider deleting first sentence of this paragraph	Redundant to language in preceding paragraph	ACP was revised per recommendation

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93	Vinnie Catalano	CIRCAC	2100	2-1	Suggest rewriting paragraph to: " There can only be one Incident Commander (IC) at a given time. However, the IC may change as an incident progresses if circumstances arise that are beyond the ability and/or resources of the RP/PRP. Then the Unified Command will choose an appropriate IC based on agency jurisdiction.	Clarify triggers for change in IC	ACP was revised per recommendation
94	Vinnie Catalano	CIRCAC	2100	2-1	Suggest moving this paragraph above the preceding one, and editing to change 2nd sentence to: "The FOSC and SOSC will make a determination of response adequacy of the RP/PRP's containment, control, and cleanup efforts."	Clarify roles related to IC	ACP was revised per recommendation
95	Vinnie Catalano	CIRCAC	2100	2-1	Suggested re-wording: Typically the OSC agency with jurisdiction will become the Incident Commander; an OSRO/PRAC OSC, may be identified, by the agency with jurisdiction."	Clarify roles related to IC	ACP was revised per recommendation
96	Vinnie Catalano	CIRCAC	2110	2-2	Capitalize "State"	Suggested grammatical edit	ACP was revised per recommendation
97	Charlene Saclamana	Kawerak, Inc.	2110.4	2-2	The LOSC directs and coordinates the local government response to an oil discharge and hazardous substance release	LOSC are not capable of doing this, if they are not trained, knowledgeable or equipped.	Comment referred to Area Steering Committee.
98	Leslie Pearson	Pearson Consulting LLC	2110.5	2-2	Please refer to RP/PRP OSC as RP/PRP IC		ACP was revised per recommendation
99	Steve Russell	152 Degrees West Environmental Services LLC	2120	2-3	The State Area Commander will prioritize the	The position of State Area Commander has not been identified or clarified within ADEC or within the AIMS guide, ADEC should define and provide appropriate delegation for the positions of State Area Commander and State Coordinating Officer.	ACP was revised per recommendation
100	Leslie Pearson	Pearson Consulting LLC	2130	2-4	Please add the acronym SOFR to your acronym list		ACP was revised per recommendation
101	Vinnie Catalano	CIRCAC	2130	2-4	Suggest changing "interest groups" to "stakeholder groups"	Consistency with other references in document	ACP was revised per recommendation
102	Charlene Saclamana	Kawerak, Inc.	2200	2-6	ADEC Safety Plan Template	Remove if access to a tool is limited to a certain audience.	ACP was revised per recommendation
103	Vinnie Catalano	CIRCAC	2200	2-5	Consider referencing 29 CFR 1910 regarding OSHA field compliance officer if appropriate	Include relevant regulatory reference	29 CFR 1910 referenced in paragraph above
104	Vinnie Catalano	CIRCAC	2210	2-6	add "and" before security...and also consider adding "delineation of the impacted area" to the list	Grammatical edit...and site delineation is important	ACP was revised per recommendation
105	Phil Johnson	DOI/OEPC	2410	2-7	Table 2-2: Investigating Agencies. Recommend adding Incident Type/Location: Violation of laws protecting wildlife and/or historic properties Investigator: Natural and Cultural Resource Trustee Agencies (USFWS, NMFS, NPS, BLM, etc.)	In addition to the NRDAR, trustee law enforcement officials may also pursue their own environmental crimes investigations (for example violations of the Endangered Species Act, Marine Mammal Protection Act, Bald and Golden Eagle Protection Act). Similar investigations related to cultural resources, historic properties and/or looting of human remains are also possible.	ACP was revised per recommendation

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106	Jeanette Alas	ADF&G	2420	2-7	Recommend updating information in the "Members and Contact Information" link and moving this information to the ACP Contact Directory in References and Tools.	Some of the contact information in the link is outdated. Moving the natural resource trustee agency contact information will allow users to more easily find it and access all required contacts in one location.	Maintaining the contact list is an on-going process. Data for this list comes from a number of sources, which including but not limited to the Alaska Division of Community Division of Community and Regional, Area Committees, EPA tribal programs. In the event of a response, SOSCF/FOSCFs will seek assistance from local communities and facilities to identify additional organizations and individuals who should be notified. Please forward any additions or corrections to the ACP Contact list to lsanden@ene.com.
107	Jill Klein	Pacific Environment	2430	2-8	2430.1	It looks like Tribal government is listed as 2630.1 and is not in order of the previous or following numerical sections.	ACP was revised per recommendation
108	Karen Pletnikoff	Aleutian Pribilof Islands Association, Inc.	2430.2	2-8	Where are co-mangement bodies addressed? This sentence might be where to add ", or co-management organizations." after non-profits	co management organizations are important for the species they work on and in spill response, they can assist with .	Natural resource agencies are responsible for coordination with co-management organizaitons.
109	Charlene Saclamana	Kawerak, Inc.	2440	2-8	Reference and tools	See comment 16:	Maintaining the contact list is an on-going process. Data for this list comes from a number of sources, which including but not limited to the Alaska Division of Community Division of Community and Regional, Area Committees, EPA tribal programs. In the event of a response, SOSCF/FOSCFs will seek assistance from local communities and facilities to identify additional organizations and individuals who should be notified. Please forward any additions or corrections to the ACP Contact list to lsanden@ene.com.
110	Steve Russell	152 Degrees West Environmental Services LLC	2450	2-8	The RCAC participates with the IMT at the EOC 203 and monitors on-water activities during a spill The RCAC provides local knowledge and technical expertise within the ICS structure (e.g., as part of the Operations, Planning Sections and the Joint Information Center).	This language is consistent with the previous Cook Inlet Sub Area Plan.	Text revised, EOC reference removed to maintain use of common terminology.
111	Linda Swiss	PWSRCAC	2450	2-9	Delete the bullet about the RCACs maintaining an emergency response plan.	Maintaining an emergency response plan is up to the RCAC's manage of course, but it's not a major function of the organization, and seems odd to mention here.	ACP was revised per recommendation

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112	Steve Russell	152 Degrees West Environmental Services LLC	2460	2-9	though some of its members may be. The RSC is not directly involved in response operations, though some of its members may be if approved by the RSC Coordinator and the LOFR.	The wording " though some its members may be" allows any member of the RSC complete access to the IMT, this can create problems as the RSC is open to any person, including potential contractors, potential civil litigants, members of the media or other persons with agendas not compatible with responsible response efforts.	ACP was revised per recommendation
113	Steve Russell	152 Degrees West Environmental Services LLC	2460	2-9	The group may have direct access to the ADEC Commissioner or his/her representative.	The Senior Leaders of Impacted Communities group is not defined as to roles or membership. In either case any coordination between this group and the ADEC commissioner should be routed through the LOFR and Crisis Management Team. Consider adding a section defining the roles, membership and responsibilities of the Senior Leaders group.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
114	Linda Swiss	PWSRCAC	2460	2-9	"Clarify the role of the ""Senior Leaders"" group, who would be selected, how they would be chosen, and in what circumstances this approach would be taken in place of the RSC (or, if both may exist concurrently, how they would be managed and operate in relation to each other). Alternatively, remove until further discussion by the AWA Area Committee. "	Improve clarity and avoid confusion or conflict during response situation.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
115	Vinnie Catalano	CIRCAC	2460	2-9	Suggest adding Tribal reps to RSC possible composition	Mentioned previously	ACP revised per recommendation
116	Vinnie Catalano	CIRCAC	2460	2-9	Suggest re-wording to: "Federal agencies with jurisdictional responsibilities for resources at risk, but not directly involved in operational activities within the ICS may participate as a member of the RSC to provide valuable input to response operations."	It is likely some federal agency representation on an RSC would occur. That said I cannot imagine an incident of any consequence requiring RSC activation that wouldn't have an FOSC or some FOSC involvement in the unified command as indicated by the statement.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
117	Vinnie Catalano	CIRCAC	2460	2-9	Please clarify how "Senior" leaders are identified and when this approach would be used in place of an RSC.	Improve clarity	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
118	Steve Russell	152 Degrees West Environmental Services LLC	2460.1	2-10	But the Unified Command may commit limited 266 time (usually less than 1 hour per day) to coordinate with the RSC.	Add new bullet to section 2460.1, The LOFR will establish a meeting schedule for the RSC and UC.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
119	Vinnie Catalano	CIRCAC	2460.1	2-10	Suggest changing 2nd sentence to, "This may be achieved via public meetings or other methods."	Allow greater flexibility rather than suggesting only one way for RSC members to communicate with their constituents. Public meetings may be costly or impractical in some areas.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
120	Vinnie Catalano	CIRCAC	2460.1	2-10	Suggest changing to: "As with all ICS meetings, the Unified Command must allocate its time carefully and may only have an hour or less to coordinate with the RSC. Therefore, all information should be timely, crucial, and concise to ensure it is considered during the planning cycle.""	Imrpove tone	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.
121	Steve Russell	152 Degrees West Environmental Services LLC	2460.2	2-10	RSC Coordinators	This section is very confusing and suggesting multiple coordinators speaking for the RSC.	No action taken. Referred to Area Committee for futher consideration on best ways to clarify role/responsibility of RSC in ACP.

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122	Leslie Pearson	Pearson Consulting LLC	2460.2	2-10	You've got RSC chair, RSC coordinators and RSC members. What's the difference between the chair and coordinator and why multiple coordinators. The RSC description is rather confusing and may benefit by having a diagram or figure to clarify.		No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
123	Steve Russell	152 Degrees West Environmental Services LLC	2460.3	2-10	RSC membership consists of the Tribal council leaders and mayors/city councils,	The inclusion of Tribal Councils in the RSC can be considered incompatible with Presidential Executive order 13175, and the State of Alaska Administrative Order 186 and is inconsistent with section 1440.3 of the AWA.	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
124	Charlene Saclamana	Kawerak, Inc.	2460.3	2-10	RSC Membership	Please list primary contact for RSC membership.	Regional Stakeholder Committees are incident specific and are established or 'activated' only during a response. Membership is based on interested parties from potentially impacted area. SOS/FOSC will initiate notification process of local and tribal governments.
125	Vinnie Catalano	CIRCAC	2460.3	2-10	Suggest removing the word "convenient" and replace with "affected"	"Convenient" was unclear	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
126	Vinnie Catalano	CIRCAC	2460.3	2-10	Suggest just adding environmental groups to the bullet list above (and also consider, in that list, revising "Oil Spill Region Environmental Coalition" for clarity	Input from these groups should be given equal recognition here	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
127	Vinnie Catalano	CIRCAC	2460.4	2-11	Remove spill response equipment from list	Recommend deleting response equipment needs from this list. Resource needs in a local area such as staples and food to replace lost resources or to support a large influx of responders is however something local representation can provide and should.	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
128	Leslie Pearson	Pearson Consulting LLC	2460.6	2-12	You may want to consider moving this after RSC Process and become 2460.2		No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
129	Vinnie Catalano	CIRCAC	2460.6	2-12	Change to, "Work with RSC member representative (or coordinator) to clarify issues to be discussed at the Unified Command meeting."	Imrpove clarity	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.
130	Vinnie Catalano	CIRCAC	2460.6	2-12	Ensure RSC guidelines are at Refs and Tools link	Was not there when checked	No action taken. Referred to Area Committee for further consideration on best ways to clarify role/responsibility of RSC in ACP.

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131	Steve Russell	152 Degrees West Environmental Services LLC	2500	2-13	<p>"Not all spills require a NRDAR, and there are no quantitative thresholds for initiating NRDAR (e.g., no minimum amount of spilled product, no requirement for USCG involvement, and no prerequisite for shoreline impacts). NRDAR Trustee Representatives decide if/when to initiate NRDAR based on the nature of the spill and its actual or potential impacts to natural resources under their jurisdictions.""</p> <p>In most cases resource trustee representatives will be established within or in direct consultation with the Environmental Unit. These representatives can provide their respective agencies with supportive information as to NRDR activation potential."</p>	<p>During a dynamic marine based spill response the only logical source of information relating to activation of the NRDAR process is within the UC/IMT of the spill response. Self activation of the NRDAR process will result in confusion, contradictory information, and will not provide the level of efficiency required for effective NRDAR.</p>	<p>No action taken. It is beyond the scope of the IMT to activate NRDAR</p>
132	Steve Russell	152 Degrees West Environmental Services LLC	2500	2-14	<p>If an Incident Command is established for a spill with NRDAR concerns, NRDAR Trustee Representatives will notify the UC of NRDR process activation and shall may appoint a NRDAR Liaison to represent the NRDAR team as a member of the Command Staff in the Incident Command Post and serve as a conduit for coordination and information exchange to/from the Incident Command.</p>	<p>By adding this language the UC (if established) will not be surprised by duplicate activities taking place within the response or affected communities.</p>	<p>ACP revised per recommendation</p>
133	Jeanette Alas	ADF&G	2500	2-15	<p align="center">Add title and/or header to table</p>	<p align="center">Table is missing information.</p>	<p>ACP was revised per recommendation</p>
134	Charlene Saclamana	Kawerak, Inc.	2430.1	2-8	<p align="center">Reference and tools</p>	<p>Tribal contact information needs to be current and updated. Refer to DHS&EM plans who maintain copies of community's with completed SCERP's that list current POC</p>	<p>Maintaining the contact list is an on-going process. Data for this list comes from a number of sources, which including but not limited to the Alaska Division of Community Division of Community and Regional, Area Committees, EPA tribal programs. In the event of a response, SOSOC/FOSOCs will seek assistance from local communities and facilities to identify additional organizations and individuals who should be notified. Please forward any additions or corrections to the ACP Contact list to lsanden@ene.com [replace with generic EPA/RRT email when available].</p>

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135	Charlene Saclamana	Kawerak, Inc.	2430.1	2-8	Reference and tools	Reach out to regional native non-profits for current contact information.	Maintaining the contact list is an on-going process. Data for this list comes from a number of sources, which including but not limited to the Alaska Division of Community Division of Community and Regional, Area Committees, EPA tribal programs. In the event of a response, SOSOC/FOSOCs will seek assistance from local communities and facilities to identify additional organizations and individuals who should be notified. Please forward any additions or corrections to the ACP Contact list to lsanden@ene.com [replace with generic EPA/RRT email when available].
136	Mark Sienkiewicz	ExxonMobil Alaska	3230.1	3-3	Add: Shoreline cleanup assessment techniques, evaluation of shoreline cleanup options, establishment of shoreline cleanup endpoints, and specific cleanup tactics are typically elaborated for each incident in a Shoreline Cleanup Plan.		ACP was revised per recommendation
137	Mark Sienkiewicz	ExxonMobil Alaska	3240	3-9	change service to serviced.		ACP was revised per recommendation
138	Mark Sienkiewicz	ExxonMobil Alaska	3240	3-9	change communicates to communities		ACP was revised per recommendation
139	Linda Swiss	PWSRCAC	3240	3-3	There is a significant amount of disposal and waste management information within the PWS Area Plan. Some of this information may be useful in the AWA plan. Consider including the information in the RCP as being applicable state-wide.	Requesting clarification regarding waste management information	This content was removed from the AWA ACP and retained in a Waste Management Job Aid.
140	Steve Pearson	DOI/BSEE	3240.1	3-3	Add " ODPCP/OSRP/FRP must include procedures for obtaining authorization to decant water collected during removal operations."	Clarifies requirements for USCG ACP Consistency Review of ODPCP/OSRP/FRP	ACP was revised per recommendation
141	Phil Johnson	DOI/OEPC	3260	3-4	Recommend adding In-Situ Burning Guidelines for Alaska and ARRT Dispersant Use Plan for Alaska to bulleted list.	These plans are referenced on lines 76 and 78, respectively, however some readers might only look at the documents highlighted in the bullets?	ACP was revised per recommendation
142	Karen Pletnikoff	Aleutian Pribilof Islands Association, Inc.	3260	3-4	Do any other OSC like TOSC get consulted or informed of dispersant use?	Dispersant use is impactful to traditional and commercial fisheries.	Consistent with ICS and the Dispersant Use Guidelines, the TOSC would be involved and aware of the decision to use dispersants. Comment referred to the Area Steering Committee.
143	Mark Sienkiewicz	ExxonMobil Alaska	3260	3-4	Change "OSC approval" to "OSCs' approvals after consultation with specific stakeholders."	See Insitu Burn and dispersant guidelines, application, and approvals/consultations required.	No action taken.
144	Mark Sienkiewicz	ExxonMobil Alaska	3260	3-4	Recommend table listing key response plans (i.e. waste management, Shoreline Cleanup, Wildlife Protection, ect.) and approvals required. Recommend further development and inclusion of common templates. Note similar list was developed in Table 4-1 for permits.		Comment referred to the Area Steering Committee.

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145	Angela Matz	DOI/FWS	3300	3-7	Add "USFWS, ADF&G, and" to the sentence: "NOAA may also be contacted for initial environmental sensitivity and wildlife concentration information."	Clarify agency roles during the response to an incident.	ACP was revised per recommendation
146	Charlene Saclamana	Kawerak, Inc.	3320	3-5	Notify natural resources trustee	define trustee - is this a land owner, city, region, tribe? Perhaps include Notify local government, so they can facilitate preparedness efforts and response. Or simply move item 5 under natural resources trustee as item "e".	No action taken. CERCLA Part 101 Section 16 defines what a natural resource trustee is. The NCP and EO 12580 defines who is a natural resource trustee
147	Steve Pearson	DOI/BSEE	3330	3-4		Sentence fragmented	ACP was revised per recommendation
148	Mark Sienkiewicz	ExxonMobil Alaska	3330	3-6	Note potential error "...various ??? have significant..."		ACP was revised per recommendation
149	Jeanette Alas	ADF&G	3330	3-7	"Add USFWS to sentence: ""NOAA and USFWS may also be..."""	USFWS is one of the three wildlife trustee agencies in the state and can provide valuable information to ADEC on wildlife, their habitats, and environmental sensitivity.	ACP was revised per recommendation
150	Leslie Pearson	Pearson Consulting LLC	3330	3-6	Change (if available) to (if necessary).		ACP was revised per recommendation
151	Leslie Pearson	Pearson Consulting LLC	3330	3-7	Should read, "The RP/PRP is responsible for making mandatory notifications". Notifications "may" rather than will		ACP was revised per recommendation
152	Leslie Pearson	Pearson Consulting LLC	3330	3-7	First bullet- delete the paranthesis after habitats		ACP was revised per recommendation
153	Leslie Pearson	Pearson Consulting LLC	3330	3-7	move the sentence (The ADEC will notify) to prior to USCG or EPA... It's lost in the rat response		ACP was revised per recommendation
154	Leslie Pearson	Pearson Consulting LLC	3330	3-8	The term "Transitional Response Team" should be changed to Incident Management Team. It's also important to not that the IMT staffing may increase or decrease.		ACP was revised per recommendation
155	Vinnie Catalano	CIRCAC	3330	3-7	Remove extra ")"	Typo	ACP was revised per recommendation
156	Vinnie Catalano	CIRCAC	3330	3-7	Indent numbered list and move "The ADEC will..." to next line	Formatting fix to improve clarity	ACP was revised per recommendation
157	Gregory Bjorgo	DOI/BLM	3500	3-9	Change Priorities to Prioritize	Incorrect word usage	ACP was revised per recommendation
158	Steve Pearson	DOI/BSEE	3600	3-9	Recommend that the ACP reference the NMFS Cook Inlet & Kodiak Marine Mammal Disaster Response Guidelines and Arctic Marine Mammal Disaster Response Guidelines. Links to these guidelines already exist in the References and Tools, but they are not explicitly cited in the ACP.	It would be helpful to reference these NMFS Guidelines somewhere in this ACP update, as 30 CFR 254.5(b) requires OSRPs to be consistent with ACPs. We recognize these guidelines will be referenced in the upcoming revisions to the Wildlife Protection Guidelines for Oil Spill Response in Alaska, however the initial updates to that plan are still underway.	ACP was revised per recommendation
159	Angela Matz	DOI/FWS	3600	3-9	Decide upon and use acronyms consistently throughout, e.g., DOI or USDOJ; DOC or NMFS; ADF&G or ADF&G Habitat.	Consistency of document.	ACP was revised per recommendation

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160	Jeanette Alas	ADF&G	3600	3-9	"Consider rewording: ""Questions regarding oiled or potentially oiled wildlife preparedness and response activities should be directed to the wildlife trustee agencies, USFWS, NMFS, and ADF&G. The ARRT Wildlife Protection Committee, responsible for the Wildlife Protection Guidelines, is chaired by USDOl.""	Existing statement conflates 'natural resource trustee agencies' with 'wildlife trustee agencies' or natural resource trustee agencies with responsibilities for wildlife management. USFWS is one of the three natural resource trustee agencies responsible for wildlife management. USFWS is a federal agency under USDOl, and USDOl is a natural resource trustee agency, but all wildlife management under USDOl is conducted by USFWS. Maintaining the connection between wildlife preparedness and response to the three natural resource trustee agencies responsible for wildlife management will alleviate confusion and provide consistency with information in the Wildlife Protection Guidelines.	ACP was revised per recommendation
161	Jeanette Alas	ADF&G	3600	3-9	Change "Wildlife Protection Plan" to "Wildlife Response Plan."	Make terminology consistent with the Wildlife Protection Guidelines.	ACP was revised per recommendation
162	Phil Johnson	DOI/OEPC	4210	4-11	Recommend adding specific examples of ADEC Maps that are helpful for spill responders. These include but may not be limited to: ADEC Drinking Water Protection Areas (http://www.arcgis.com/home/item.html?id=13ed2116e4094f9994775af9a62a1e85); ADEC PPR (http://www.arcgis.com/home/item.html?id=ed7027b903bc4c79a4e35461cdf1d6b2); Alaska DEC Seafood Processing (http://www.arcgis.com/home/item.html?id=d686c1f3c1e54e7c910a55ca8c9f15b2).	There are so many ADEC web maps, it would be helpful to point responders in the right direction. We referenced some of these web maps during the latest update of the Northwest Arctic Subarea Contingency Plan. That plan may have additional text to consider regarding drinking water protection, seafood processing sites as resources at risk, etc.	ACP was revised per recommendation
163	Phil Johnson	DOI/OEPC	4210	4-11	Recommend including a link to the BLM's Spatial Data Management System - https://sdms.ak.blm.gov/isdms/imf.jsp?site=sdms	This system, along with the State's Alaska Mapper, provide information on land management status.'	This will be added to References and Tools in the Mapping and GIS Section.
164	Phil Johnson	DOI/OEPC	4210	4-11	Table lists ERMA, while in References and Tools, ERMA is not mentioned. It does list Environmental Response Management Application®, NOAA. Recommend cross referencing these by using the acronym ERMA on the linked page, or by spelling out the acronym in the table.	Not all users of this ACP will be familiar with ERMA.	ACP was revised per recommendation
165	Linda Swiss	PWSRCAC	4320	4-13	The link to the "Job Aid for Volunteer Use" is under the logistics section, not resources section. Also, this same information appears in the PWS area plan as part of the plan, not as an appendix. Consider this information be in the plan and not in an appendix.	Consistency across plans is desirable.	ACP was revised per recommendation. This content was moved to make the plan more responder-friendly across all 4 ACPs.
166	Steve Pearson	DOI/BSEE	4610	4-14	Are ACS Priority Protection Sites recognized as GRS?	Requesting clarification.	Referred to Area Steering Committee to followup with ACS.
167	Angela Matz	DOI/FWS	4630	4-14	Include the name of the trust resource agencies in this paragraph.	This paragraph is similar to one the cited directly above, but this paragraph doesn't list the names of any of the "Trust resource agencies."	Comment referred to Area Steering Committee.
168	Linda Swiss	PWSRCAC	4630	4-14	Section 4640.1 in the PWS plan contains a chart showing "Information Sources". This reference provides a quick reference to spill responders and their respective roles. Consider placing a similar reference into the AWA plan.	Stakeholders should be able to quickly reference who has jurisdiction over a given resource. The reference chart used in the PWS plan, section 4640.1 provides this information.	Comment referred to Area Steering Committee.

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169	Linda Swiss	PWSRCAC	4630	4-14	Similar to the above comment, the PWS plan has more developed sections on Areas of Environmental Concern (section 4640.2), Resource Sensitivity (section 4640.3), Habitat types (section 4640.4.1), Biological Resources (4640.4.2), and Human Resources Uses (4640.4.3). While beyond the scope of this review, recommend the AWA review the PWS plan and determine if these sections and information are valuable for inclusion in the plan. This issue could be advanced through further workgroup efforts as the plan is updated in the future.	The PWS plan provides a good example on how to address areas of public concern, habitat types, aquaculture uses, and seasonal patterns of common animal species, etc. As a future project, recommend the AWA work towards cataloging and providing similar information.	The Prince William Sound ACP was derived from a single former subarea plan. The Arctic Western Alaska ACP was derived from 7 former subarea plans. This information has been combined as one statewide reference to support all 4 ACPs. Please refer to the References and Tools Website, See: Sensitive Areas Compendium for this information.
170	Angela Matz	DOI/FWS	4850	4-15	Change the title from “4850 – ESA Consultations” to “4850 – ESA Section 7 Consultations”	The recommended title is more technically correct.	ACP was revised per recommendation
171	Linda Swiss	PWSRCAC	4850	4-15	In the AWA plan, Section 4850 is ESA consultations. Section 4850 in the PWS plan is for Permits. Also, there are discrepancies with 4860, 4870, 4880.	Consistency across plans is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.
172	Leslie Pearson	Pearson Consulting LLC	4860	4-16	Delete TBD after Letter of State Interest		ACP was revised per recommendation
173	Angela Matz	DOI/FWS	4880	4-18	Table 4-1: Recommended changes follow.		ACP was revised per recommendation
174	Angela Matz	DOI/FWS	4880	4-18	Remove references to Appendix 24 and 25 and refer simply to Wildlife Protection Guidelines.	These Appendices are being replaced in the revised Wildlife Protection Guidelines.	ACP was revised per recommendation
175	Angela Matz	DOI/FWS	4880	4-18	Include USFWS (as well as NMFS) in MMPA instructions.	Clarify agency roles during the response to an incident.	ACP was revised per recommendation
176	Angela Matz	DOI/FWS	4880	4-18	Combine rows for “NMFS Endangered Species Act” in Alaska and “Endangered Species Act Permits”	Consolidate Endangered Species Act information.	ACP was revised per recommendation
177	Angela Matz	DOI/FWS	4880	4-18	Change “Migratory Bird Treaty Act Special Purpose Salvage Permit”; to “Migratory Bird Permit”.	Improve accuracy of statement.	ACP was revised per recommendation
178	Angela Matz	DOI/FWS	4880	4-18	Change “DOI-Fish and Wildlife Service Special Use Permit” to “DOI-Fish and Wildlife Service National Wildlife Refuge Special Use Permit”	Improve accuracy of statement.	ACP was revised per recommendation
179	Phil Johnson	DOI/OEPC	4880	4-17	Recommend adding In-Situ Burning Guidelines for Alaska and ARRT Dispersant Use Plan for Alaska to bulleted list.	See comment 28.	ACP was revised per recommendation
180	Jeanette Alas	ADF&G	4880	4-18	Recommend deleting “(Appendix 24)” and “(Appendix 25).”	Major revisions to the 2012 WPG (which these permit names link to) are currently underway and are expected to be finalized by the end of 2019, and should include changes to the names and content of these permits. Deleting references to Appendix 24 and 25 may help alleviate confusion in the interim between when updates to the WPG are finalized and when the next version of AWA ACP is updated.	ACP was revised per recommendation
181	Linda Swiss	PWSRCAC	5110	5-1	Fix sentence.	Grammatical edit	ACP was revised per recommendation

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182	Leslie Pearson	Pearson Consulting LLC	5110	5-1	Delete the word "relevant"		ACP was revised per recommendation
183	Phil Johnson	DOI/OEPC	5210	5-3	Define BOA and briefly describe.	Many readers will not know what a BOA is. There is no further discussion in the paragraphs that follow.	ACP was revised per recommendation
184	Linda Swiss	PWSRCAC	5220.2	5-4	Eliminate the word "the" before Alaska.	Grammatical edit	ACP was revised per recommendation
185	Linda Swiss	PWSRCAC	5340	5-5	Verify accuracy of section number. In the AWA plan, section 5340 (with further sub breakdowns) is for Transportation & Heavy Equipment. 5340 is for Clothing in the PWS plan, but 5350 gets used for clothing in the AWA plan.	Consistency across plans is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.
186	Steve Pearson	DOI/BSEE	5360	5-6	Add "Arctic-weight winter clothing is required for responses above the Arctic Circle Oct -May."	Recommend require arctic cold weather gear Oct-May to be consistent w/ industry practices	No action taken. Thank you for your comment.
187	Phil Johnson	DOI/OEPC	5360	5-6	Brown bear safety, bear guards and PPE are discussed in this section. Recommend discussing these issues with the USFWS and ADF&G. In particular recommend expanding the text to discuss polar bears and the potential for responder/bear interactions and best management practices.	USFWS should be included in helping develop appropriate language that could go in this section and/or on page 9-29 where polar bears are specifically mentioned.	ACP was revised per recommendation
188	Linda Swiss	PWSRCAC	5410	5-6	Suggest that the same limitations apply to cellular networks as listed for cellular.	Complete information	ACP was revised per recommendation
189	Vinnie Catalano	CIRCAC	5420	5-7	Limitations listed for satellite also apply to cellular	Improve clarity	ACP was revised per recommendation
190	Linda Swiss	PWSRCAC	5430	5-8	Verify accuracy of section number. In the AWA plan, section 5430 is for Interpreters. This differs from the PWS plan where 5430 is for Federal Communications Assets. Also, the AWA plane discusses the ALMR radio system in 5420. In the PWS plan, this ALMR info is in section 5440.2.	Consistency across plans is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.
191	Charlene Saclamana	Kawerak, Inc.	5430	5-8	EPA and USCG Tribal Coordinators	Further define USCG Tribal Coordinators, provide contact information	Contact information will be updated when available. Comment referred to Area Steering Committee.
192	Linda Swiss	PWSRCAC	6200	6-1	Verify accuracy of section number as there are differences between the AWA and PWS plans through the entire 6200 series.	Consistency across plans is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.

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193	Charlene Saclamana	Kawerak, Inc.	6220.4	6-3	Please make this a clickable link...		ACP was revised per recommendation
194	Steve Russell	152 Degrees West Environmental Services LLC	6310	6-4	Cost Recovery Direct from the RP/PRP: see AS 46.04.010	Adding statutory justification for recovery of costs incurred should be included.	ACP was revised per recommendation
195	Linda Swiss	PWSRCAC	7000	6-1	Verify accuracy of section number as there are differences between the AWA and PWS plans through the 7000 series. For example, 7220 is Command in the AWA, but Responsible Party Action related in the PWS plan. This includes sections 7210, 7220, 7230, and 7240 that do not match the PWS plan.	Consistency across plans is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.
196	Mark Sienkiewicz	ExxonMobil Alaska	7130.1	7-3	typo: :unknown"		ACP was revised per recommendation
197	Linda Swiss	PWSRCAC	7410.2	7-12	"LEPCA" is used - which may be intended to be "LEPC" (otherwise please add to acronym list and spell out)	Typo or clarification needed	ACP was revised per recommendation
198	Linda Swiss	PWSRCAC	8000	8-15	Fix page numbers	Page number edit	ACP was revised per recommendation
199	Leslie Pearson	Pearson Consulting LLC	8120	8-20	also Alaska Marine Pilots Association in Dutch Harbor		ACP was revised per recommendation
200	Linda Swiss	PWSRCAC	8120.1	8-19	The acronym PPOR needs to be defined and added to the acronym list. Additionally, the hyperlink redirects to page 9-32 and not the ADEC PPPOR site which is here: https://dec.alaska.gov/spar/ppr/response-resources/ppor/	Acronym and correct link	ACP was revised per recommendation
201	Linda Swiss	PWSRCAC	8120.1	8-19	Consider changing "Harbor" to "Place" to match Potential Places of Refuge nomenclature. The word "places" appears in the bold title and also throughout the paragraph.	Use of the term "place" is perhaps more consistent with developed PPOR policy and terminology.	ACP was revised per recommendation
202	Leslie Pearson	Pearson Consulting LLC	8130.1	8-21	Is it really necessary to discuss the Unified Command again? Recommend referencing back to 2100		ACP was revised per recommendation.
203	Leslie Pearson	Pearson Consulting LLC	8130.2	8-22	The response communication information should be moved to 5400 and then reference here.		ACP was revised per recommendation.
204	Todd Duke	1-Call Alaska RESOLVE Marine	8130.3	8-23	Correct citation for training guidelines should be NFPA 1005, Standard for Professional Qualifications for Marine Fire Fighting for Land-Based Fire Fighters	NFPA 1405: Guide for Land-Based Fire Departments That Respond to Marine Vessel Fires. The guide identifies the elements of a comprehensive marine fire-fighting response program for land-based fire fighters responding to fight fires on vessels. While it does include training recommendations, the actual training qualification standard is NFPA 1005	ACP was revised per recommendation.
205	Leslie Pearson	Pearson Consulting LLC	8140	8-24	Add TBD after Checklist		ACP was revised per recommendation.
206	Leslie Pearson	Pearson Consulting LLC	8150	8-25	Marine Response Alliance no longer exists. Now Ardent update throughout this section referenceing the USCG approved SMFF providers.		ACP was revised per recommendation.

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207	Leslie Pearson	Pearson Consulting LLC	8150.1	8-24	Why Cook Inlet and Kodiak and no listing of assets in the Aleutian Islands?		A list of SMFF assets for other areas is not currently available. This section is referred to the Area Steering Committee.
208	Todd Duke	1-Call Alaska RESOLVE Marine	8150.3	8-25	Add Resource: RESOLVE MARINE GROUP, Location Anchorage, AK Dutch Harbor, AK, Fort Lauderdale, FL, Phone +1 907 243 0069, +1 954 764 8700	Update to SMFF resources	ACP was revised per recommendation.
209	Todd Duke	1-Call Alaska RESOLVE Marine	8150.3	8-26	Add Resource: 275 gal Foam Concentrate (x4) AFFF-ATC, Location Anchorage 1,100 gal Total and Dutch Harbor Alaska 1,100 Gal Total :RESOLVE MARINE GROUP, Phone +1 907 243 0069, +1 954 764 8700	Update to SMFF resources	In response to several comments, erroneous/ out-of-date equipment tables have been removed and a list of the 4 SMFF service providers are included at top of chapter with note to contact for current available resources and capability. This chapter is referred to the Area Steering Committee for future revision.
210	Todd Duke	1-Call Alaska RESOLVE Marine	8150.3	8-27	Add Resource: RESOLVE MARINE GROUP, Location Anchorage, AK Dutch Harbor, AK, Fort Lauderdale, FL, Phone +1 907 243 0069, +1 954 764 8700	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
211	Todd Duke	1-Call Alaska RESOLVE Marine	8150.3	8-27	Resource: RESOLVE Marine Services Alaska: Capibilities: 3" Diesel Pump Package (x 3, 350 GPM), Lightering Pump Package 6" (x1, 3,300 GPM) Location: Anchorage Numerous pumping systems in Dutch harbor including 4 and 6 in Elec Sub Pumps Dop 250 6" Hyd Sub lightering pump POC: RESOLVE Marine Services Anchorage Phone: 907 243 0069	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
212	Linda Swiss	PWSRCAC	8150.3	8-25	The phone number for the USCG is not complete. Upper row to the right.	Typo	See Response to Comment #209. Comment referred to Area Steering Committee.
213	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-28	Portable Monitors and Wolverine Pump (x1, 4500 GPM), Location: Anchorage Portable Monitors and Aleyska Fire Pump (5,000 GPM) Dutch Harbor POC Resolve Marine Services Alaska, Location: Anchorage, 907 243 0069	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
214	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-28	RESOLVE PIONEER, 80T BP, Company: RESOLVE Marine Services Alaska, Location: Dutch Harbor, Contact Phone Number 907 243 0069, 1 954 764 8700	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
215	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-28	Portable Monitors and Wolverine Pump (x1, 4500 GPM), Location: Anchorage POC Resolve Marine Services Alaska, Location: Anchorage, 907 243 0069	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
216	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-28	RESOLVE PIONEER, 80T BP, Company: RESOLVE Marine Services Alaska, Location: Dutch Harbor, Contact Phone Number 907 243 0069, 1 954 764 8700	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
217	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-29	Add Resource: 275 gal Foam Concentrate (x4) AFFF-ATC, Location Anchorage:RESOLVE MARINE GROUP, Phone +1 907 243 0069, +1 954 764 8700	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
218	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-29	Add Resource: RESOLVE MARINE GROUP, Location Anchorage, AK Dutch Harbor, AK, Fort Lauderdale, FL, Phone +1 907 243 0069, +1 954 764 8700	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.

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219	Todd Duke	1-Call Alaska RESOLVE Marine	8150.4	8-29	Resource: RESOLVE Marine Services Alaska: Capabilities: 3" Diesel Pump Package (x 3, 350 GPM), Lightering Pump Package 6" (x1, 3,300 GPM) Location: Anchorage POC: RESOLVE Marine Services Anchorage Phone: 907 243 0069	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
220	Todd Duke	1-Call Alaska RESOLVE Marine	8200	8-31	RESOLVE maintains a fully dedicated Emergency Response tug in Dutch Harbor. This section should recognize this dedicated capability, as a tug capable of towing a stricken vessel is an absolutely critical component of successful ETS deployment.	Update to SMFF resources	See Response to Comment #209. Comment referred to Area Steering Committee.
221	Linda Swiss	PWSRCAC	8200	8-31	The acronym ETS (emergency tow system?) needs to be defined and added to the acronym list.	Acronym	ACP was revised per recommendation
222	Linda Swiss	PWSRCAC	8330.2	8-32	The acronym SOPEP needs to be defined and added to the acronym list.	Acronym	ACP was revised per recommendation
223	Linda Swiss	PWSRCAC	8330.3	8-34	The acronym SERT needs to be defined and added to the acronym list. It is defined (Safety Center Salvage Engineering Response Team) on page 8-38, but is used many times prior to this.	Acronym	ACP was revised per recommendation
224	Linda Swiss	PWSRCAC	8360	8-36	Eliminate the word "cocktail".	Suggested stylistic edit	ACP was revised per recommendation
225	Todd Duke	1-Call Alaska RESOLVE Marine	8370.2	8-40	Remove references to Marine Response Alliance	Marine Response Alliance is no longer an operating entity	ACP was revised per recommendation
226	Linda Swiss	PWSRCAC	8370.2	8-40	Barge volume is now 107,500 per barge.	In 2018, the tug and barge contractor changed in PWS from Crowley to Edison Chouest. A total of four, purpose built, spill response barges were constructed for this contract. The barges have a volume of (approximately) 107,500 bbls. Information source: SERVS technical manual Edition 3, revision 2, 12/5/2018.	References to out of region resources were removed. Reference appropriate ACP (i.e. PWS, SE, Inland) when planning use of out of region resources.
227	Todd Duke	1-Call Alaska RESOLVE Marine	8370.3	8-41	Table 8-9: Bristol Bay Salvage and Towing Companies - remove Magone Marine from "Salvage & Diving Companies" and replace it with Resolve Marine Services Alaska, Phone Number 907 243 0069, 1 954 764 8700. Capabilities are diving, salvage, towing, support vessels Salvage Engineering, Marine Fire Fighting Oil Spill Response.	Magone Marine was purchased by Resolve Marine Group in 2015 and no longer operates under this name.	ACP was revised per recommendation. Service provider contact information moved to the top of Chapter.
228	Todd Duke	1-Call Alaska RESOLVE Marine	8370.3	8-41	RESOLVE PIONEER, 80T BP, Company: RESOLVE Marine Services Alaska, Location: Dutch Harbor, Contact Phone Number 907 243 0069, 1 954 764 8700	Update to SMFF resources	ACP was revised per recommendation. Service provider contact information moved to the top of Chapter.
229	Todd Duke	1-Call Alaska RESOLVE Marine	8730.2	8-39	Please change Magone Marine Services Inc. to RESOLVE Marine Services Alaska, 907 243-0069 www.resolvemarine.com Also add Location Anchorage and add Engineering, Marine Fire Fighting, Oil Spill Response under capabilities	Since date of last writing our facility name and website names have changed.	ACP was revised per recommendation. Service provider contact information moved to the top of Chapter.
230	Todd Duke	1-Call Alaska RESOLVE Marine	8730.2	8-40	RESOLVE has firefighting pumps in Anchorage, Dutch Harbor, and Juneau. RESOLVE has heavy Lightering equipment packages in Juneau, Anchorage, and Dutch Harbor. RESOLVE maintains light lightering kits in Anchorage, Homer, and Nome. RESOLVE also maintains two Tugs in Dutch Harbor that could initiate, and maintain a response effort in Alaska	This sentence is dated and does not reflect significant asset expansion that occurred in FY 2018.	See Response to Comment #209. Comment referred to Area Steering Committee.

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231	Todd Duke	1-Call Alaska RESOLVE Marine	8730.2	8-40	In addition to the RESOLVE IBIS, RESOLVE has stationed both the RESOLVE PIONEER (80T BP Offshore Tug) and the Makushin Bay. Both of these vessels are crewed and available to respond to both a Towing or Oil spill related Casualty. RESOLVE also has (2) 500 bbl FRAC Tanks, (2) 5,000 bbl Skid Tanks, and Numerous smaller tote ISO tanks available in Dutch Harbor.	The current wording does not reflect significant capability growth that has occurred in region. Inclusion of the RESOLVE PIONEER and the MAKUSHIN BAY would better reflect a higher marine towing and response standard that has been present in the Aleutian Islands since 2016. It is important to note that our build out has changed the Salvage model in region, as now one provider has a dedicated response resource instead of relying entirely on as-available commercial assets.	See Response to Comment #209. Comment referred to Area Steering Committee.
232	Todd Duke	1-Call Alaska RESOLVE Marine	8730.6	8-41	RESOLVE MARINE and PENCO maintain fly away diving teams located in Anchorage and Dutch Harbor that could respond to the North Slope of Alaska. The RESOLVE PIONEER could be utilized to mount a salvage effort in the North Slope. Anticipated arrival times would be 4 days for the Chukchi Sea, and 5 days for the Beaufort. (at 10 knots)	The current wording does not account for capability that presently exists.	See Response to Comment #209. Comment referred to Area Steering Committee.
233	Todd Duke	1-Call Alaska RESOLVE Marine	8730.7	8-41	RESOLVE MARINE and PENCO maintain fly away diving teams located in Anchorage and Dutch Harbor that could respond to the Northwest Arctic. The RESOLVE PIONEER could be utilized to mount a salvage effort in the Northwestern region. Anticipated arrival times for the RESOLVE PIONEER would be 2.5 days the Bering Sea South of the Bering Strait and 3.5 days for areas north of the Bering Strait (at 10 knots).	The current wording does not account for capability that presently exists.	See Response to Comment #209. Comment referred to Area Steering Committee.
234	Todd Duke	1-Call Alaska RESOLVE Marine	8730.8	8-41	RESOLVE MARINE and PENCO maintain fly away diving teams located in Anchorage and Dutch Harbor that could respond to the Northwest Arctic. The RESOLVE PIONEER could be utilized to mount a salvage effort in the Western Alaska region. Anticipated arrival times for the RESOLVE PIONEER would be 2 days north of Hagemeister island (at 10 knots).	The current wording does not account for capability that presently exists.	See Response to Comment #209. Comment referred to Area Steering Committee.
235	Jill Klein	Pacific Environment	9100	9-1	The notification of appropriate federal, state, municipal and tribal agencies and organizations.	Add tribal governments and organizations to the emergency notification sequence as is referred to in line 185 of section 2430.	ACP was revised per recommendation
236	Phil Johnson	DOI/OEPC	9210	9-8	Volunteer organizations including Bird Treatment and Learning Center and the Juneau Raptor Center are listed in Table 9-3. Recommend working with USFWS to develop appropriate text for this section.	All bird rehabilitation work needs to be authorized by the USFWS, who authorize and oversee these activities.	Volunteer section in Logistics revised to address this concern. Contacts moved to contact database.
237	Linda Swiss	PWSRCAC	9210.1	9-2	Suggest listing only organizations that have direct connection to AWA area (or clarifying those from outside area). Ensure all links work.	Enhance clarity.	ACP was revised per recommendation
238	Linda Swiss	PWSRCAC	9400	9-0	The PWS plan features community profiles within section 9240.1; a subset of the greater Local Resources & Agencies section. The SE plan uses 9770 for Community Profiles. The AWA plan uses 9750 to describe geographic zones within the AWA. Suggest aligning numbering as much as practical as plan development proceeds across Alaska. Additionally, the Community Profiles link provided in the AWA section 9750 is not functional.	Consistency across Area Plan section numbering is desirable.	USCG guidance stipulates ACP section consistency at the thousands (1XXX) and hundreds level (X1XX). It also provides the tens (XX1X) and ones (XXX1) level for the Area or District use. There will be some natural deviation at the local level based on response needs and resources.
239	Linda Swiss	PWSRCAC	9410	9-10	Confirm this table has up-to-date information. PWSRCAC does not specifically track incidents or spills outside of the Exxon Valdez oil spill area.	Suggested plan content improvement for future consideration.	Comment referred to Area Steering Committee.

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240	Leslie Pearson	Pearson Consulting LLC	9500	9-14	Add Alternative Planning Criteria Agreements. These are government agreements with industry since NPC cannot be met in WAK and Arctic.		A paragraph describing APCs was added to 1440.6
241	Todd Duke	1-Call Alaska RESOLVE Marine	9700	GENERAL	"This Section lacks a specific set of methodology in its assessment of geographic areas. While the Aleutians and Bristol Bay subsections are useful and flow well, Sections like Kodiak provide too much background information on geography, history, risk assessments, and lack any depth in immediately useful response information (resources, providers, etc.) No Resource Provider section for the Aleutians similar to table 9.8 and 9.9 for Bristol Bay This inconsistency is also present in sections being far to brief to be useful. For instance, Cook Inlet begins with an explanation of potential Command Centers, then shifts to a section (missing a header?) assumed to be GEOGRAPHIC ZONE DESCRIPTION, lacks the depth of discussion found in the aforementioned sections, and only goes into depth on area cultural/environmental stakeholders and porta-john suppliers. This type of inconsistency is present throughout the section and does not provide useful, readily accessible, and clear information for each subarea. "	A suggestion would be to develop a methodology for each area similar to the approach taken in Alaska DEC's [Subarea Plan] Appendix B Resources Section.	This content is form the Background Section of the former Subarea Plans. It was retained for reference. Comment referred to the Area Committee.
242	Steve Pearson	DOI/BSEE	9710	9-28	Change "Barrow" to "Utqiagvik"	Formally changed name.	ACP revised per recommendation
243	Steve Pearson	DOI/BSEE	9710	9-28	Change "Barrow" to "Utqiagvik"	Formally changed name.	ACP revised per recommendation
244	Steve Pearson	DOI/BSEE	9710	9-28	Change "Barrow" to "Utqiagvik"	Formally changed name.	ACP revised per recommendation
245	Linda Swiss	PWSRCAC	9710	9-14	Consider adding the black and white maps from the currently approved plan (see section 1210) to the geographic zone descriptions in the proposed plan. These maps make it easy to see exactly what the "Kodiak Island" (for example) geographic zone refers to. The maps found in the proposed plan (page 1-7) do a good job of showing the greater area boundaries, but further detail seems appropriate within the geographic zone descriptions.	Being able to visually see a given geographic zone helps provide context.	These maps are available on via the References and Tools, under Mapping and GIS. Specifically •Alaska State Geo-Spatial Data Clearinghouse, Geographic Zone data
246	Jill Klein	Pacific Environment	9710	9-14	Add tribal and/or TOSC into the description for each geographic section on community contacts, key facilities and services.	Tribal governments and tribal administrators are key "local" government agencies that should be included in the key contacts section. Regional tribal organizations would be appropriate to ask for their input on how these sections should read for consistency and coordination at the "local" community level.	Tribal contacts are on the ACP Contact Directory, available on References and Tools Page, on on the DCRA Community Database
247	Todd Duke	1-Call Alaska RESOLVE Marine	9710.2	9-18	ADD:RESOLVE Marine Services Alaska, Location: Anchorage, Dutch Harbor, Contact Phone Number 907 243 0069, 1 954 764 8700	The format utilized in these if applied to an area would a clear picture as to what resources might be available in the respective subarea. As the draft plan stands now there is no methodology to the analysis of certain subareas, leaving to inconsistent area information and little to no discernable immediate response value.	Section 9710, Geographic Zone Descriptions, is referred to the Area Steering Committee.
248	Vinnie Catalano	CIRCAC	9710.6	9-30	Missing General Description and Risk Assessment	Add info comparable to previous sections	Section 9710, Geographic Zone Descriptions, is referred to the Area Steering Committee.

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249	Charlene Saclamana	Kawerak, Inc.	9710.7	9-30	Subsistence hunting and fishing...	May need to update this section to reflect growing economic endeavors.	Section 9710, Geographic Zone Descriptions, is referred to the Area Steering Committee.
250	Vinnie Catalano	CIRCAC	9710.7	9-30	Missing General Description and Risk Assessment	Add info comparable to previous sections	Section 9710, Geographic Zone Descriptions, is referred to the Area Steering Committee.
251	Linda Swiss	PWSRCAC	9750	9-31	The community profile link is not functional. Also see section 9240 comments above. PWSRCAC supports the move to a digital web version of community profiles. This should help ensure the most up to date information is available, while also eliminating a large amount of paper from the plan.	Fix link	This section now refers to the DCRA Database with hyperlink at top of chapter
252	Charlene Saclamana	Kawerak, Inc.	9900	9-32	Reserved for Area/District	Perhaps list the communities with SCERP's and completed oil spill response plans with contact information.	A link to DHSEM's Small Community Emergency Response Plan Page will be added to the References and Tools webpage.
253	Mark Leary	Native Village of Napaimute /Marce Simeon	1000	1-4	Current wording "including adjacent shorelines and waters up to 200 nautical miles offshore from the mean low tide coastline."	No wording change but rather a point of clarification needed with regards to jurisdiction. Are there separate plans that are within 200 miles of the mean low tide and inland past the 200 miles mark? Are these plans cohesive and collective with response action specifically with regards to cross jurisdiction? How do we reduce conflict between the plans? Finally, where would I find a plan specific to the Middle Kuskokwim area?	The Native Village of Napaimute is located in the Alaska Inland Area. Additional information about the Alaska Inland Area is available at: https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/inland-area/ . Contact Area Secretary Mary Goolie at goolie.mary@epa.gov for more information. Comment referred to Alaska Inland Area Steering Committee.
254	Mark Leary	Native Village of Napaimute /Marce Simeon	1310	1-10	TBD	There are a lot of gaps in a contingency plan to have multiple areas that are "To Be Determined". The plan should be complete and comprehensive or if a TBD is necessary, a process should be listed as to how an organization can be added to the contact information list.	Acronym list edited. TBD = To Be Developed. Comment referred to Alaska Inland Area Steering Committee.
255	Mark Leary	Native Village of Napaimute	1320	1-10	TBD	The Purpose is "To Be Determined." Is this an opportunity for the stakeholders listed in 1310 to have input on the purpose? The purpose is of paramount concerns and should be definite prior to any plan implementation.	Comment referred to Alaska Inland Area Steering Committee.
256	Mark Leary	Native Village of Napaimute /Marce Simeon	1340	1-10	TBD	Again, having such ambiguity as to who the members are is confusing.	Comment referred to Alaska Inland Area Steering Committee.

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257	Mark Leary	Native Village of Napaimute /Marce Simeon	1400	1-10	Current wording "The strategic coordination will involve, as appropriate, the National Response Team, Alaska Regional Response Team, the Governor of Alaska, and the mayor or other chief executives of local governments.	The Native Village of Napaimute is in the process of procuring a Landing Craft Mechanism (LCM). Determining a way to be involved in possible response in the middle Kuskokwim Region, prior to the contingency plan implementation, is imperative to regional response success. Utilization of local resources and personnel will ensure an effective and efficient response program. Again, this comment is in reference to the Donlin Mine, which is one of the largest undeveloped gold deposits in the world. How do we adequately equip, prepare, train, stage, and facilitate a response team in the Mid Kuskokwim region while utilizing Tribal partners and their on-hand resources? One of the factors of this dialog is to ensure Tribal opportunities to secure grant funding to be involved and proactive in any response activities.	The Native Village of Napaimute is located in the Alaska Inland Area. Additional information about the Alaska Inland Area is available at: https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/inland-area/ . Contact Area Secretary Mary Goolie at goolie.mary@epa.gov for more information. Comment referred to Alaska Inland Area Steering Committee.
258	Mark Leary	Native Village of Napaimute /Marce Simeon	1420	1-11	Current Wording "The ARRT provides a regional mechanism for the development and coordination of preparedness activities prior to a pollution response."	Reiterating response in line 5 is outlaying the process for Tribal involvement at every level.	The ARRT is a regional or statewide coordinating body. The Area Committees are responsible for maintaining pollution event response plans, including coordination with local governments. Tribes may participate at every level. Comment referred to Alaska Inland Area Steering Committee
259	Mark Leary	Native Village of Napaimute /Marce Simeon	1500	1-16	TBD	The Native Village of Napaimute is interested in being apart of the process and rather than just stating "TBD" it would be beneficial to outline the process of how it will be determined and more importantly how do we ensure that we are involved from the beginning.	Acronym list edited. TBD = To Be Developed. Comment referred to Alaska Inland Area Steering Committee.
260	Mark Leary	Native Village of Napaimute /Marce Simeon	1600	1-16	TBD	Please refer to rationale in box 7	Acronym list edited. TBD = To Be Developed. Comment referred to Alaska Inland Area Steering Committee.
261	Mark Leary	Native Village of Napaimute /Marce Simeon	1610	1-16	TBD	Please refer to rationale in box 7	Acronym list edited. TBD = To Be Developed. Comment referred to Alaska Inland Area Steering Committee.
262	Mark Leary	Native Village of Napaimute /Marce Simeon	1630	1-16	TBD	Please refer to rationale in box 7	Acronym list edited. TBD = To Be Developed. Comment referred to Alaska Inland Area Steering Committee.

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263	Mark Leary	Native Village of Napaimute /Marce Simeon	2440	2-8	Reference Section 9230 for federally recognized Tribe information.	The Native Village of Napaimute is a federally recognized tribe and wants to be engaged in the Arctic & Western Alaska Area Contingency Plan. It is our intention to provide input on incorporating a larger geographic area that will provide adequate and timely response to the Middle Kuskokwim, focusing on the exponential increase of possible hazardous contamination with a large mining operation. Determining the venue and process to actively engage is an identified priority.	Comment referred to the Alaska Inland Area Steering Committee.
264	Linda Swiss	PWSRCAC	6310.2.1	6-4	Include and define "RSA" in the acronym list.	Unclear what RSA is.	ACP was revised per recommendation
265	Todd Duke	1-Call Alaska RESOLVE Marine	8150.1 & 8150.2	8-24	Compared to the Cook Inlet/Kodiak Sections both the Aleutian and Bristol Bay subareas are not defined in detail. As both these regions have significant vessel traffic and potential need for MFF information development of these sections is to be desired. This area also contains personnel and equipment to be FULLY compliant with the 19 required criteria in 33cfr155.4030	As both of these sections stand they provide no readily utilizable response information. We would be happy to lead a subgroup to develop these sections for both Bristol Bay and the Aleutians,.	See Response to Comment #209. Comment referred to Area Steering Committee.
266	Leslie Pearson	Pearson Consulting LLC	8150.3 Table 8-1	8-25	Recommend checking this list to validate what currently exists. The SMFF Providers have staged equipment in AK, which isn't reflected here. Old resources. Contact CISPRI for an update of vessels with fire monitors. Also T&T Salvage stores additional items in Anchorage, CISPRI		See Response to Comment #209. Comment referred to Area Steering Committee.
267	Jill Klein	Pacific Environment	9000 Appendices	9-3	Add new address for Bering Sea Fishermen's Association 821 N Street, Suite 103. New Address for Yukon River Drainage Fisheries Association: PO Box 2898, Palmer, Alaska 99645, Add: Yukon River Inter-Tribal Fish Commission and Kuskokwim River Inter-Tribal Fish Commission. Add Yukon Delta Fisheries Development Association and Kwik'pak Fisheries.	There are new organizations and new addresses. May want to find a way to keep this updated or refer to another centralized list like the DRCA database if there is one for fisheries groups. Maybe delete the mailing addresses and just provide organization, website and phone number. There are organizations listed here that may not fish in the area and the list could be paired down.	Contact info moved to Contact Directory. Updates to this directory are an on-going database.
268	Todd Duke	1-Call Alaska RESOLVE Marine	9710.2.1	9-18	Please change Magone Marine Services Inc. to RESOLVE Marine Services Alaska, 907 243-0069 www.resolvemarine.com	Please add our contact information as we possess capability within the region.	Contact info moved to Contact Directory. Updates to this directory are an on-going database.
269	Vinnie Catalano	CIRCAC	9710.4.2	9-25	Remove reference to "Kodiak Island Geographic Zone plan"	No longer a separate plan	ACP was revised per recommendation
270	Vinnie Catalano	CIRCAC	9710.4.2	9-25	Fix typo ("theCity of Kodiak")	Typo	ACP was revised per recommendation
271	Steve Pearson	DOI/BSEE	Acronyms	xi	Add BSEE - Bureau of Safety and Environmental Enforcement	Reference BSEE in Section 1460.1 without defining acronym.	ACP was revised per recommendation
272	Steve Pearson	DOI/BSEE	Acronyms	xi	Add OSRP - Oil Spill Response Plan	OSRP is similar to ODPCP but required by Federal Government for offshore facilities in the OCS.	ACP was revised per recommendation
273	Jeanette Alas	ADF&G	Acronyms and Abbreviations	xiv	Add new acronym: WPG = Wildlife Protection Guidelines for Alaska	This is a key document for wildlife planning and response for oil spills.	ACP was revised per recommendation
274	Jill Klein	Pacific Environment	Acronyms and Abbreviations	xiv	Add: (TOSC) Tribal on scene coordinator	The acronym is used in section 1440.3 and should be used in additional sections of the document to add consistency in use of the TOSC in the plan.	ACP was revised per recommendation

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275	Vinnie Catalano	CIRCAC	Acronyms and Abbreviations	xii	Change GUIE to GIUE	Correction	ACP was revised per recommendation
276	Vinnie Catalano	CIRCAC	Acronyms and Abbreviations	xiv	Add definition for TFR	Definition is missing. Overall suggest reviewing to ensure acronyms are spelled out on first use and all of them are included in Acronym list.	ACP was revised per recommendation
277	Jill Klein	Pacific Environment	All	All	A longer comment period of more than 30 days would be appropriate for a plan as multi-faceted as the AWA ACP.	Tribes and other stakeholder organizations may not have had the time or resources to dedicate to a thorough review of this plan in the 30 day window.	Comment referred to Area Steering Committee.
278	Jill Klein	Pacific Environment	Appendices		Add the AWA Area Committee members as an appendice	I could not find a roster of the AWA area committee members on the website. I see the charter for the committee and what looks like a possible steering committee member list but do not see any other membership information. It would be good to add the membership rosters to the AWA ACP or a link to the roster on the DEC website.	Charters for each area subcommittee are listed on the AWA webpage. These charters include members.
279	Jill Klein	Pacific Environment	AWA ACP	All sections	Add tribal government and tribes when appropriate in all sections of the AWA ACP to ensure consistent use of language that will help clarify the role of tribes and municipalities at the "local community level" in the AWA ACP.	All sections in the document should be reviewed for the inclusion of tribal governments and or corporations and organizations as a part of the AWA ACP. The use of the term local throughout the document is broad and not defined. Clear language should be written when referring to a tribal or municipal government at the community level.	ACP was reviewed per recommendation.
280	Jill Klein	Pacific Environment	Definitions	9-36	Tribal on-scene coordinator (TOSC): the person designated by the local tribal government as incident commander.	This new addition is missing from the definitions.	ACP was revised per recommendation
281	Austin Ahmasuk	Kawerak, Inc.	entire ACP		matrix comments are poor method for gathering input	AK DEC should extend the timeframe for comment and allow for narrative comment. Residents in rural villages may struggle with matrix submission, though Excel's character limit is large at over 32,000 characters that does not equate to the best method for gathering input	Comment referred to Area Steering Committee.
282	Charlene Saclamana	Kawerak, Inc.	General		Provide ICS forms	Annex useful response forms for smaller communities.	ICS forms are on the References and Tools page.
283	Charlene Saclamana	Kawerak, Inc.	Proposed Changes		Online Access, hyperlinking	Consider audience outside of major hubs, they do not have reliable access to internet	Comment referred to Area Steering Committee.
284	Leslie Pearson	Pearson Consulting LLC	Table 5-1	5-2	The USCG weblink doesn't take you to the DRAT equipment nor can you find it when searching this website.		Bad hyperlink removed
285	Leslie Pearson	Pearson Consulting LLC	Table 5-1	5-2	State agency ADEC, add Add website link like you did for the federal agencies: http://dec.alaska.gov/spar/ppr/response-resources/local-response/		Removed links in table
286	Todd Duke	1-Call Alaska RESOLVE Marine	Table 8-2	8-28	M/V Woldstad is no longer owned and operated by AK State Troopers	Vessel now owned by Support Vessels of Alaska http://www.supportvesselsofalaska.com/contact-us/	See Response to Comment #209. Comment referred to Area Steering Committee.
287	Steve Pearson	DOI/BSEE	9000	9-13	Change "North Slope crude oil" in Cook Inlet GeoZone to "crude oil"	No logical path for North Slope crude to impact Cook Inlet.	ACP was revised per recommendation

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288	Linda Swiss	PWSRCAC	9000	9-1	Suggest using "Inland FOSC EPA" instead of naming individuals. This also appears in the appendix, page 9-1, table 9-1.	Consistency with USCG FOSC and the SOSC	ACP was revised per recommendation
289	Linda Swiss	PWSRCAC	General		Consider adding links to documents referenced in boxes.	Ease of use	The hyperlinks in the plan primarily lead to the Reference and Tools page. This facilitates sustainable plan management and hyperlink integrity across all four Alaska ACPs.
290	Todd Duke	1-Call Alaska RESOLVE Marine			Remove Marine Hazard Response, Marine Response Alliance, and Boots and Coats.	No longer an operating entity.	See Response to Comment #209. Comment referred to Area Steering Committee.
291	Todd Duke	1-Call Alaska RESOLVE Marine		8-26	Add Resource: RESOLVE MARINE GROUP, Location Anchorage, AK Dutch Harbor, AK, Fort Lauderdale, FL, Phone +1 907 243 0069, +1 954 764 8700	Resolve holds 24,000 gallons of 1X3 AFFF ATC across the United States including 3,330 gallons in the State of Alaska. Resolve also has the proper foam delivery equipment for application.	See Response to Comment #209. Comment referred to Area Steering Committee.
293	Linda Swiss	PWSRCAC		xiv	Acronym list is missing the following: tribal on scene coordinator (TOSC) (page 1-13), a reference to RSA (page 6-4, line 140), LEPCA ? (page 7-12, line 367), State Emergency Response Commissions (SERC) and Local Emergency Planning Districts (LEPD) (both on page 7-12, line 370 vicinity), PPOR (page 8-19, line 168), ETS (page 8-31, line 405), SOPEP (8-32, line 444), SERT (page 8-34, line 454)	Complete acronym list	ACP was revised per recommendation
294	Linda Swiss	PWSRCAC		xiv	Spell out acronyms the first time they are used in plan.	Ease of use	For ease of use, acronym list is the first use of the word. This streamlines the plan. Assumption is that plan users will be familiar with the common response terminology or contingency planning, in general, prior to use.

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295	Andrew Hartsig	Ocean conservancy	General		<p>As the Area Committee moves to modernize the AWA Contingency Plan, make use of webbased resources and ensure mobile access, it should bear in mind that users in smaller communities may not always have access to high-speed internet and/or the most recent computer or mobile hardware.¹ We encourage the Area Committee to work with representatives of coastal communities to ensure the AWA Contingency Plan remains fully functional for those with suboptimal internet connections and/or older computer or mobile software and hardware. (2) We appreciate the AWA Contingency Plan’s focus on “a coordinated multi-jurisdictional or a unified command response.” AWA Contingency Plan at 2-1. Recognition of the role of tribal representation and a tribal on-scene coordinator (TOSC) is also a positive step. See e.g., id.at 2- 2. To ensure timely and meaningful engagement with local and tribal entities, it may be useful for the AWA Contingency Plan to develop and articulate a more robust communication plan. The Area Committee should reach out and work closely with local and tribal entities in the 1 Even the “comment matrix” that DEC suggests using for this comment period may present difficulties for some users with older software or hardware. region to add specificity to the AWA Contingency Plan’s communication protocols, ensure LOSCs and SOSCs have up-to-date and accurate contact information, socialize the Plan and conduct training exercises. Working more closely with local and tribal entities will also help ensure the Area Committee has a realistic understanding of the quantity and quality of local response assets and the extent to which residents have adequate training to engage in response operations. We urge the Area Committee to consider and address comments submitted by tribal entities in the region.</p>		<p align="center">Comment referred to Area Steering Committee.</p>
296	Austin Ahmasuk	Kawerak, Inc.		2-11	<p>Of concern to the Unified Command are resource needs of an immediate nature.</p>	<p>Subsistence resources can be and likely have been impacted upon chronic and decadal scales from the oil and hazardous spills that have already occurred in this region. The Unified Command should bring in environmental justice narratives and long term scale response and planning efforts that reflects oil and hazardous substances as well as military brownfield locations are long lived in the environment. See Exxon Valdez effects with its political, community, and personal scale consequences.</p>	<p>The AWA ACP is an emergency response operational plan. See AWA ACP Section 2500, Natural Resource Damage Assessment and Restoration. See also, References and Tools: Wildlife Protection Guidelines for Alaska and Sensitive Areas Compendium for additional information. Comment referred to Area Steering Committee.</p>
297	Austin Ahmasuk	Kawerak, Inc.	9000	9-11	<p>The AEWG promotes whaling of those living in northern and western Alaska</p>	<p>The AEWG is only one organization and it only represents whaling communities. This section is wholly deficient to capture the subsistence and hunting traditions of the people of the Bering Strait region and other AK Native communities. The AKDEC needs to reach out to many more Alaska Native Organizations and Kawerak for the proper narrative in this section. Line 734-735 is merely a straight copy of lines 36-37. The copying of information should never be done. We in rural Alaska are not all the same</p>	<p>This information was retained from the former Western Alaska Sub-Area Plan. Resource trustee agencies will coordinate with Co-Management Organizations on an incident-specific basis. Comment referred to Area Steering Committee.</p>

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298	Austin Ahmasuk	Kawerak, Inc.	1000	1-9	The most important functions are to make proper notifications and initiate emergency response sequence	Oil spills create intense attention and political uproar, perhaps bringing unlikely people together in a political struggle for action, answers and solutions. AKDEC has only listed the first actions to address a spill and not the political consequence. The first function should be to train people in all villages, establish adequate sea to sea, air to sea, and village to spill assets can be deployed and a seamless transition from outside on scene coordinators to actual spill response occurs. The lives our people who depend on subsistence will be impacted and there should be adequate fish and wildlife personnel to address fish and wildlife impacts. While safety is a number one concern respect for our life is also a huge concern and that respect happens when there is mutual and collaborative training. Communication plan and issues in rural communities can have challenges, especially if communication links go down and or no communication available.	Comment referred to Area Steering Committee.
299	Austin Ahmasuk	Kawerak, Inc.	7000	7-9	Local governments are eligible for up to \$25,000 cost reimbursement per incident but must meet strict requirements	\$25,000 is not enough. Losses to conduct business in rural Alaska is expensive. Funding for upfront costs should be considered and planned for. Considering some communities have in place Hazard Mitigation Plans which make them eligible for FEMA funding it would be important for communities to be fully informed and trained on the possible interconnectedness of funds available for incidents and the requirement to meet reimbursement.	Comment referred to Area Steering Committee.
300	Austin Ahmasuk	Kawerak, Inc.	General		AK DEC does not cite the source of any of the important wildlife habitat areas.	There is considerable debate as to important wildlife habitat areas. Tribes and possibly Kawerak should have large input into the sources of information regarding important wildlife habitat areas.	The AWA ACP is an emergency response operational plan. See AWA ACP Section 2500, Natural Resource Damage Assessment and Restoration. See also, References and Tools: Wildlife Protection Guidelines for Alaska and Sensitive Areas Compendium for additional information. Comment referred to Area Steering Committee.
301	Austin Ahmasuk	Kawerak, Inc.	General		AK DEC does not cite the source of any of the social, economic, and cultural welfare issues it made	see above statement	Comment referred to Area Steering Committee.
302	Austin Ahmasuk	Kawerak, Inc.	1000	1-13	AK DEC suggest tribes can contribute information about sensitive resources	Tribes and Kawerak have already performed some studies but those efforts required multi-year approaches and significant funding. AK DEC should reconsider this statement and expectation as something that could happen but requires considerable effort in order to be collaborative	Comment referred to Area Steering Committee.
303	Joel Curtis	NWS	3200	3-5	3. Evaluate Severity Add c. Obtain on-scene weather conditions d. Obtain short-term site and transit forecasts from NWS		ACP was revised per recommendation

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304	Joel Curtis	NWS	3400	3-8	add https://www.weather.gov/aawu/ for enroute and on-scene aviation weather conditions	add tool	ACP was revised per recommendation
305	Joel Curtis	NWS	4220	4-3	References and Tools: NWS Spot weather contacts: Anchorage 907-266-5167 Fairbanks 907-458-3800	add contact	Refer to the ACP Contacts directory for this information.
306	Joel Curtis	NWS	5410	5-6	Communications NWR This was an unusual paragraph for us with regard to our operations protocols. We need to discuss this one with you for putting an announcement on NWR.	recommendation	Comment referred to Area Steering Committee.
307	Joel Curtis	NWS	6000	6-3	Section 6000 Finance/Administration One of the sorely neglected concepts in IDSS Deployments is the concept and interagency agreements on reimbursements. I suspect that we come under line 104 6240.2 - Other Agencies		Comment referred to Area Steering Committee.
308	Joel Curtis	NWS	7000		Hazardous Substances I see some insertions where contacting the NWS would be a SOP		Comment referred to Area Steering Committee.
309	Joel Curtis	NWS	7000	7-5	Table 7-3 Each "Federal" entry should have NOAA/NWS		NOAA/NWS would have a role in response to oil spill, hazsub, biological, rad, or natural disaster, it would not be a federal lead agency, no revision made.
310	Joel Curtis	NWS	7000	7-7	"Environmental Monitoring and Forecasts" We have the capability of plume forecasts including Hyspilt and CAMEO		ACP was revised per recommendation
311	Joel Curtis	NWS	7000	7-7	Insert " Plume and Runoff Forecasts"		ACP was revised per recommendation
312	Joel Curtis	NWS	7000		bullet NWS Forecast Office - Trajectory Forecasts		ACP was revised per recommendation
313	Joel Curtis	NWS	7000		Insert bullet " Continue Environmental Monitoring and Forecasts for mitigation."		ACP was revised per recommendation
314	Joel Curtis	NWS	8000	8-2	Tides, weather, sea state , currents, ice that frustrate response		ACP was revised per recommendation
315	Joel Curtis	NWS	8000	8-5	"Prevailing winds and forecasts"		ACP was revised per recommendation
316	Joel Curtis	NWS	8000	8-5	add "NWS Forecasts"		ACP was revised per recommendation
317	Joel Curtis	NWS	8000	8-6	add "sea state" and "tides" and "currents"		ACP was revised per recommendation
318	Joel Curtis	NWS	8000	8-6	add "sea state" and "ice"		ACP was revised per recommendation
319	Joel Curtis	NWS	8000	8-11	Table 8-3, Hey they remembered us!		Comment referred to Area Steering Committee.
320	Joel Curtis	NWS	8000	8-16	Table 8-6 add "Weather Forecasts"		ACP was revised per recommendation
321	Joel Curtis	NWS	9200	9-1	add "NWS Anchorage Forecast Office 907-266-5167 (24/7)" NWS Fairbanks Forecast Office 9807-458-3800 (24/7)"		Refer to the ACP Contacts directory for this information.
322	Becky Baird	DNR-DMLW NRO	1000	1-3	Hyperlink does not work	Fix hyperlink	ACP revised per recommendation
323	Becky Baird	DNR-DMLW NRO	1210	1-7	The boundaries of the AWA Area are not clear as depicted	Bound the area on the seaward and inland sides with the same line	As a federal construct the AWA Area boundaries mirror the USCG Sector Anchorage Captian of the Port Zone boundaries. These boundaries do not overlap with State of Alaska's statutorily defined response regions.
324	Becky Baird	DNR-DMLW NRO	1210	1-7	Clearly denote the USCG boundary and the Geographic Zone Boundary		Figure 1-3 includes two depictions of the boundary.
325	Becky Baird	DNR-DMLW NRO	3500	3-9	Change priorities to prioritize	correct wording	ACP revised per recommendation

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326	Terra Meares	DNR-DMLW NRO	7130.1	7-3	Once the public safety threat is over, what does the process look like to evaluate the potentially remaining environmental threat? It is unclear how decisions to change jurisdiction for a given response. What is the process?	ADNR manages lands across the state of Alaska (uplands, tidelands, and submerged lands), and as such is concerned with both the public safety threat as well as the remaining environmental threat, both immediate and long term, due to future authorizations on lands managed by the State.	In general, long term clean up or remediation is managed in a process separate from emergency response. In Alaska, DEC's Contaminated Sites Program, USEPA, US Army Corps of Engineers, along with others manage remedial projects.
327	Terra Meares	DNR-DMLW NRO	7130.1	7-3	Are there scenarios in which responsibilities are transferred from the FOSC to the State (or SOS)?	ADNR would need to coordinate and work with the designated regulator regarding long-term cleanup or site remediation on lands managed by ADNR.	In general, long term clean up or remediation is managed in a process separate from emergency response. In Alaska, DEC's Contaminated Sites Program, ADNR, USEPA, US Army Corps of Engineers, along with others manage remedial projects.
328	Terra Meares	DNR-DMLW NRO	7210	7-5	If the landowner does not fall under 'resource agencies', please add as a necessary notification.		ACP revised per recommendation
329	Terra Meares	DNR-DMLW NRO	7220	7-5	The table shows the EPA and USCG as federal lead agencies for Oil, however the chapter indicates that the FOSCs do not have authority to respond to hazardous material incidents that do not include hazardous substances (as defined by CERCLA).		Correct, CERCLA defines federal hazardous substances. Alaska's definition of hazardous substances (AS 46.03.826) is much broader and includes oil.
330	Terra Meares	DNR-DMLW NRO	7230.4	7-7	Long-term cleanup actions should involve/include the landowner in identifying target cleanup points, mitigation of impacts, and in case of potential institutional controls.		In general, long term clean up or remediation is managed in a process separate from emergency response. In Alaska, DEC's Contaminated Sites Program, ADNR, USEPA, US Army Corps of Engineers, along with others manage remedial projects.
331	Terra Meares	DNR-DMLW NRO	7230.5	7-8	Depending on the hazardous waste, some scenarios may present options of burying waste or landfarming waste (especially in remote areas of Alaska). In these potential scenarios, the landowner must be involved in the decision process.	Burials and landfarming or landspreading could potential require a decision or permit from ADNR on State managed lands.	In general, long term clean up or remediation is managed in a process separate from emergency response. In Alaska, DEC's Contaminated Sites Program, ADNR, USEPA, US Army Corps of Engineers, along with others manage remedial projects.
332	Terra Meares	DNR-DMLW NRO	7310	7-10	It looks as though this section still needs to be completed, in its current state it is repetitive and confusing.		Section 7000 is scheduled to undergo comprehensive review Spring 2020.
333	Terra Meares	DNR-DMLW NRO	7410	7-10	Link does not work for: The 2010 Statewide Hazards Analysis		The Statewide Hazardous Materials Commodity Flow Study is available from the References and Tools webpage.
334	Terra Meares	DNR-DMLW NRO	7410.2	7-12	The Statewide Hazmat Workgroup members list (available on ADEC's Hazmat Response page) was last updated 6/2017, is the list still current and how often is the list updated?		Comment referred to Statewide Hazmat Workgroup and Area Steering Committee .
335	Terra Meares	DNR-DMLW NRO	7410.3	7-12	Link for SERC does not work.		Comment referred to Area Steering Committee.

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336	Becky Baird	DNR-DMLW NRO	8000	8-29	Add caption to table even if it is a continuation from the previous page	Reference	See Response to Comment #209. Comment referred to Area Steering Committee.
337	Becky Baird	DNR-DMLW NRO	8000	8-29	Format table columns so words or not broken into two lines	Ease of reading	See Response to Comment #209. Comment referred to Area Steering Committee.
338	Becky Baird	DNR-DMLW NRO	8000	8-30	Add caption to table even if it is a continuation from the previous page	Reference	See Response to Comment #209. Comment referred to Area Steering Committee.
339	Terra Meares	DNR-DMLW NRO	8150.3	8-26	Have the manufacturers of firefighting foam transitioned to alternative foams from AFFF or anticipating to?		See Response to Comment #209. Comment referred to Area Steering Committee.
340	Terra Meares	DNR-DMLW NRO	8340	8-35	It looks like objective 9 should be two objectives: Create a salvage plan. Mitigate potential impacts of the....		See Response to Comment #209. Comment referred to Area Steering Committee.
341	Patty Burns	DNR-DMLW Environmetnal Coordinator	General			The organization of the document is somewhat confusing. It would be helpful if there was a decision tree near the front of the document that shows how jurisdictional decisions are made. This should integrate how contaminant influences jurisdictions.	This document is organized by ICS Section per USCG Commandant instruction.
342	Terra Meares	DNR-DMLW NRO	General		The plan includes numerous links, some of which direct you to a contact list. Is there a system to update the links, verify they all work, and how often is contact information updated (especially for lists maintained from another site/organization)?	Efficient response communication and data inquiry during a spill response.	The links within each ACP are to be kept to a minimum and should be limited to links managed by signatory agencies. The references and tools webpage is centrally located to each ACP and is updated regularly.
343	Patty Burns	DNR-DMLW Environmetnal Coordinator	General			The operations section should include both CERCLA and petroleum contamination. It seems like the logical section for both topics.	CERCLA is addressed in Section 7000 per USCG Commandant instruction.