

**Table 1.0: Request for Additional Information on Trident Seafoods Corporation ODPCP (21-CP-5185)**

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
1.	1-4	1		The figure depicts the four Area Contingency Plan boundaries and the 10 geographic zones, not the ADEC Regional Response Team Areas of Coverage. Please relabel.	
2.	1-C-1	1		Please delete “1.907.786.3483 (alt)” from the U.S. Fish and Wildlife Service row. It is no longer used. Consider adding their spill response email address: fwsakspillresponse@fws.gov.	
3.	1-K-5, 1-K-8, 1-K-26, 1-K-28, 1-L-10, and 1-L-21	1		<p>Protection of Sensitive Resources or Environmental Unit rows: Please change all uses of “Wildlife <i>Protection</i> Plan” to “Wildlife <i>Response</i> Plan” so the terminology is consistent with the <i>Wildlife Protection Guidelines for Oil Spill Response in Alaska</i> (WPG).</p> <p>For the General Response Objectives &amp; Strategies tables, consider further revising the bullets to “Protect wildlife resources by developing <i>and implementing</i> Wildlife Response Plan.”</p>	
4.	1-K-8, 1-K-26, 1-L-21	1		<p>Scenarios 1, 2, and 3:</p> <p>Containment, Control &amp; Recovery: 4th bullet: Recommend moving this bullet to the Protection of Sensitive Resources row and changing “wildlife <i>hazing</i>” to “wildlife <i>response</i>” so activities other than just hazing are included.</p> <p>Protection of Sensitive Resources: The “T” in SCAT is for “Technique” not “Team” - please correct. This error occurs multiple other places in the plan. Please check entire document and correct as needed.</p>	
5.	1-K-10	1		5-12 hrs	

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				<p>SCAT Team 1 states "<i>Conduct Scat, report findings to OSC.</i>" However, it seems unlikely that SCAT teams would be mobilized to the site, have time to conduct a SCAT survey, and complete a report of their findings within 5-12 hours of the spill. Is SCAT Team 1 conducting shoreline reconnaissance instead of SCAT surveys?</p> <p>The bottom of this table is cut off for the 5-12 hrs column.</p>	
6.	1-K-10, 1-K-13, 1-K-37, 1-K-40, 1-K-43, 1-L-24, 1-L-28, 1-L-32, 1-L-36, 1-L-40, 1-L-44	1		<p>The plan indicates that ACN or SEAPRO equipment and personnel will be mobilized for SCAT task forces. However, SCAT teams are typically comprised of multiple state and federal agencies and a responsible party representative, not PRAC personnel. It is understood that PRAC personnel may conduct shoreline assessments/reconnaissance (aerial, foot, or vessel based observations) prior to SCAT teams arriving and conducting SCAT surveys, but wording elsewhere in the plan indicates that SCAT reports are used to inform shoreline cleanup operations and that implies something more involved than shoreline assessment/reconnaissance. Please reconcile.</p> <p>Table 2 on page 1-K-40 appears mislabeled. Should it be Table 4?</p>	
7.	1-K-46	1		<p>In the 36 – 48 hrs column, the last team is called SCAT Teams 1 &amp; 2 but the activities listed are for “shoreline recovery” not SCAT operations. Please reconcile.</p>	
8.	1-K-14, 1-K-38, 1-K-41, 1-K-44,	1		<p>Wildlife Teams: The plan states “<i>Active in progress (Permit Approved)Conduct hazing/ bird recovery/ rehabilitation as needed and as directed.</i>” If bird recovery/ rehabilitation is</p>	

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	1-K-47, 1-L-29, 1-L-33, 1-L-37, 1-L-41, 1-L-45			needed, these activities would require the mobilization of ACN's or SEAPRO's subcontractor, International Bird Rescue. Likewise, if marine mammal hazing or capture and rehabilitations is needed, this would require the mobilization of ACN's subcontractor, Alaska SeaLife Center (SEAPRO's Technical Manual does not indicate a contract with a marine mammal wildlife response organization). Therefore, recommend the following (or similar) edit: "Active in progress (Permit Approved for bird hazing). As needed, wildlife contractors will be mobilized to the site and permits/authorizations will be obtained for additional wildlife response activities."	
9.	All scenario pages	1		None of the scenarios identify specific Environmentally Sensitive Areas or Areas of Public Concern at the scenario locations, nor do they include maps of response actions (e.g., where boom is placed to contain spill or protect sensitive areas). Recommend including.	
10.	All scenarios	1		For the Operations Section, the General Response Objectives & Strategies tables do not include information on all of the task forces that are shown in the Response Resource Mobilization Charts. For example, the mobilization charts include task forces for SCAT, Shoreline Recovery, Wildlife, Air Ops, and Waste but the objectives and strategies of these task forces are not evident in the General Response Objectives & Strategies tables.	
11.	1-K-37, 1-K-40	1		6-12 hrs column and 12-24 hours column: The plan states that Shoreline Recovery Teams 1 and 2 will be directed by the SCAT report. However, it is unlikely that a SCAT team will have already mobilized to the site, conducted SCAT surveys, and documented their findings in a report by hours 6-12 or even 12-24	

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				hours on day 1. Should day 1 teams instead be directed by shoreline reconnaissance efforts, as indicated in SCAT Teams 1 & 2?	
12.	1-K-1 through 1-K-51	1		The hose separation scenario in St Paul and the Southeast Alaska Scenario are both Part K (the Response Planning Standard Western Alaska scenario is labeled Part L). Consider separating the first two scenarios into different parts for the ease of the reader.	
13.	1-L-4 through 1-L-7	1		There appears to be two figures with a +12 Hours trajectory and two figures with a +48 Hours trajectory. Should one of each of these be a different time after the release?	
14.	1-L-10	1		Environmental Unit row: Recommend adding " <i>Identify &amp; Prioritize Sensitive Areas (ICS-232)</i> " to the 0 - 6 hrs column because this will also help inform what permits and applications might be needed.	
15.	1-L-12	1		Logistics Section, 6 - 12 hrs: Consider moving " <i>Activate Wildlife Response Plan</i> " to the Operations Section table because this section is responsible for implementing the plan in the field. The Logistics Section is more likely to mobilize wildlife response contractors to facilitate implementing the Wildlife Response Plan.	
16.	1-L-14 and 1-L-18	1		Planning Section, Environmental Unit: All four rows in both tables include wording to "follow," "implement," or "continue ops" for the Wildlife Response Plan but those activities are carried out by the Operations Section. Consider changing the wording to something such as "Review and update Wildlife Response Plan" for the Environmental Unit information.	
17.	1-L-22	1		Second bullet in last row:	

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				"(South East Alaska Petroleum Response Organization" should be deleted because SEAPRO is not being mobilized for this scenario.	
18.	1-L-23	1		Wording about vessel versus flight transit should be updated for Off Shore Teams 1& 2 in both columns because the airport on Akun Island is completed.	
19.	3-B-5	3		It is unclear why the ICS ORGANIZATION: UNIFIED COMMAND STAFF chart is blank.	
20.	3-B-11	3		Second bullet under 5. Wildlife Branch: Change "natural resource trustee <i>relationships</i> " to " <i>coordination with</i> natural resource trustees."	
21.	3-G-2 and 3-J-1	3		ACN now also has a contract with the Alaska SeaLife Center for marine mammal response (see ACN Response Manual for more information). Recommend adding this information to Parts G and J of the plan.	
22.	3-J-2	3		<p>Recommend changing the <i>California Oiled Wildlife Care Network wildlife guidelines</i> to the <i>Wildlife Protection Guidelines for Oil Spill Response in Alaska</i> in the Reference table. This is an important and more relevant document to include when discussing wildlife and oil spill response in Alaska.</p> <p>The Alaskan Seabird Colony Catalog row is not up to date. Please update using the North Pacific Seabird Data Portal: <a href="http://axiom.seabirds.net/maps/js/sea_birds.php?app=north_pacific#z=3&amp;ll=55.00000,-170.00000">http://axiom.seabirds.net/maps/js/sea_birds.php?app=north_pacific#z=3&amp;ll=55.00000,-170.00000</a>.</p>	
23.	4-H-2	4		<p>In the first sentence, correct the name of this document to <i>Wildlife Protection Guidelines for Oil Spill Response in Alaska</i> .</p> <p>BAT Table This table does not include information on ACN's contract with the Alaska SeaLife Center. Please add.</p>	

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				<p>Consider revising the Option 1 column to something else, such as <i>new fixed facility</i> or <i>other outside contractors</i> because IBR uses its fixed facility in Anchorage for the cleaning and rehabilitation of birds. Temporary stabilization facilities will be set up as needed in remote areas for birds, but then they are transported to Anchorage for cleaning and rehabilitation. At minimum, the Availability row for this column should be modified to reflect this information.</p> <p>Age &amp; Condition and Existing column: It is unclear which "Team" and "mobile unit" is being referred to in this cell. Please add clarifying information.</p> <p>Environmental Impacts and Option 1: The information provided in this cell does not address Environmental Impacts. Also, IBR has successfully stabilized birds in the field then transported them long distances to their fixed facility in Anchorage for cleaning and rehabilitation, so that information is incorrect.</p>	
24.	4-H-2 (page number is repeated)	4		<p>BAT text: The ASLC does not provide treatment and rehabilitation for oiled birds. Please delete.</p> <p>The plan states “<i>SEAPRO have a connection to International Wildlife Research (IWR).</i>” but it is unclear what this means. Will IWR be mobilized by SEAPRO for sea otter response? Will additional wildlife contractors be mobilized for marine mammals other than sea otters if needed?</p>	

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				<p>Please update the USFWS and NMFS websites for information on Threatened and Endangered Species:                      USFWS: <a href="https://ecos.fws.gov/ipac/">https://ecos.fws.gov/ipac/</a>                      NMFS:  <a href="https://www.fisheries.noaa.gov/resource/data/alaska-endangered-species-and-critical-habitat-mapper-web-application">https://www.fisheries.noaa.gov/resource/data/alaska-endangered-species-and-critical-habitat-mapper-web-application</a></p>	
25.	N/A	Appendix B		<p>The last paragraph references the Alaska Regional Contingency Plan for information on sensitive areas, but this information is found in the <i>Alaska Sensitive Areas Compendium</i> which is incorporated by reference in the four Area Contingency Plans. Please revise. Natural resource agencies can also provide information on ESAs as part of the Incident Management Team. Recommend also including information on Areas of Particular Concern in this section of the plan.</p>	
26.	5	Appendix F		<p>The correct acronym for the U.S. Fish and Wildlife Service is USFWS. Please correct here and elsewhere in the document as needed.</p> <p>This page is labeled “5 of 6” but there is not another page after it.</p>	

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