

United States fish and Wildlife Service

1) Recommend updating all references to the Wildlife Protection Guidelines (WPG) for Oil Spill Response in Alaska to the most current version (2020.2)

2) Page 1-11 section 1.2.2 Table 1.2-6: changes were made to this table in the WPG v2020.2. Recommend updating with Table 4.1 from WPG v2020.2.

3) Page 1-28 section 1.6.10: Paragraph after table, third sentence states, "IWR is approved for the response and treatment of all marine mammals including sea otters." Recommend confirming this with IWR- to commenter knowledge it is the Alaska SeaLife Center that is authorized to respond and treat marine mammals other than otters.

4) Page 3-38 section 3.9.1 Table 3.9-1: Remove row for Steller's Eider. The facilities are not in range of this species.

5) Page 3-41 section 3.9.1. Many of the bird colonies included here are far from the facilities. recommend updating this list with bird colony information from the North Pacific Seabird Database: Third full paragraph: recommend updating with bird colony data from https://axiom.sesabirds.net/maps/js/seabirds.php?app=north_pacific#z=3&11=55.00000,-170.00000.

6) Pages 3-43 & 3-44 section 3.9.1,: Endangered Species and Critical Habitats pg 3-43- The facility is within the range of the short-tailed albatross (listed under the Endangered Species Act (ESA) as endangered) and should be included in this section. Note that critical habitat has not been designated for this species. More information can be found on the USFWS short-tailed albatross page: <https://ecos.fws.gov/ecp/species/433>. Pg 3-44- Remove first paragraph. Only the Southwest Alaska stock of northern sea otters is listed as threatened under the ESA; the Southeast Alaska stock of sea otters (the population in the vicinity of the facilities) is protected under the Marine Mammal Protection Act, but is not listed under the ESA. Northern sea otter stock ranges can be found on the USFWS Northern Sea Otter web page: <https://ecos.fws.gov/ecp/species/2884>.

Table 1.0: Request for Additional Information on Petro 49, Inc., Sitka Bulk Plan ODPCP (24-CP-1017)

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
1.	Throughout	Throughout		Recommend updating all references to the Wildlife Protection Guidelines for Oil Spill Response in Alaska to the most current version (2020.2).	
2.	1-11	1.2.2		Table 1.2-6 Changes were made to this table in the WPG v.2020.2. Recommend updating with Table 4.1 from WPG v2020.2.	
3.	1-28	1.6.10		Paragraph after table, third sentence states, “IWR is approved for the response and treatment of all marine mammals including sea otters.” Recommend confirming this with IWR – to my knowledge it is the Alaska SeaLife center that is authorized to respond and treat marine mammals other than otters.	
4.	3-38	3.9.1		Table 3.9-1 Remove row for Steller’s eider. The facilities are not in range of this species.	
5.	3-41	3.9.1		Birds Many of the bird colonies included here are far from the facilities. Recommend updating this list with bird colony information from the North Pacific Seabird Database: Third full paragraph: Recommend updating with bird colony data from https://axiom.seabirds.net/maps/js/seabirds.php?app=north_pacific#z=3&ll=55.00000,-170.00000 .	
6.	3-43 and 3-44	3.9.1		Endangered Species and Critical Habitats Page 3-43 The facility is within the range of the short-tailed albatross (listed under the Endangered Species Act (ESA) as endangered) and should be included in this section. Note that critical habitat has not been designated for this species. More information can be found on the USFWS short-tailed albatross page: https://ecos.fws.gov/ecp/species/433 . Page 3-44 Remove first paragraph. Only the Southwest Alaska stock of northern sea otters is listed as threatened under the ESA; the	

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