Table 1.0: Request for Additional Information on Petro 49 Tank Vessel ODPCP (25-CP-5235)

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
1.	Title Page	Intro		Incorrectly lists the ADEC Plan number as 25-CP-5325. Should be listed as 25-CP-5235, per previously issued certificates (20-CP-5235) and application received (25-CP-5235).	Revised plan number on title page.
2.	ii	Distribution List		Alaska Department of Natural Resources 550 West 7th Avenue, Ste. 900c Anchorage, AK 99501 Add: dnr.scro.spill@alaska.gov	Revised ADNR suite for Anchorage address and added the email address for the southcentral regional office.
	vi,vii, viii	Table of Contents			Adjusted page numbers due to shifts from revisions to RFAIs. Also, added GRS in Appendix D per request in RFAI 18.
3.	1-4	1.2		Table 1.2-2 National Marine Fisheries Service: Update the phone numbers to 907-957-8147 and 323-366-9150 (alternate). U.S. Fish and Wildlife Service: Delete the alternate phone number because it is not a USFWS phone number. The primary USFWS number in the table is a 24-hr emergency response phone number.	Revised the primary and alternate phone numbers for the NMFS and removed the alternate number for USFWS.
	1-4, 1-5	Table 1.2-3			Changed On Scene Commander title to Initial Incident Commander to align with the rest of the plan.
4.	1-6	1.2		Update the U.S. Dept of the Interior phone number and address to: 907-227-3783 3801 Centerpoint Dr., Suite 400-500 Anchorage, AK 99503 Update the National Marine Fisheries Service phone number to 907-957-8147.	Updated the DOI phone number and address as requested. Updated the NMFS phone number. Revised footnotes for clarity per request.

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				Footnotes 1-4 in the Area of Responsibility column for the three wildlife agencies (USFWS, NMFS, and ADF&G) are used inconsistently (e.g., some species/species groups have footnotes and others don't (such as Bald & Golden Eagles - USFWS and Migratory Birds and Terrestrial Mammals - ADF&G). Also, it is unclear if footnotes 1-4 in this table are directing readers to footnotes 1-4 in Table 1.2-6 or just to Table 1.2-6 in general. For clarity and consistency, recommend using just one footnote (1) for all wildlife species in this table and change footnote 1-4 to "1 See Table 1.2-6 for permits and authorizations." Then renumber all other footnotes in this table. Also, as written, footnote 1-4 should reference Table 1.2-6 for permits and authorizations, not 1.2-7.	
5.	1-6	1.2, Table 1.2-4		Add: dnr.scro.spill@alaska.gov	Added email address.
6.	1-11	1.2.2		Table 1.2-6 ADEC 2024d is cited here but is not included in the Bibliography; however, the Wildlife Protection Guidelines for Oil Spill Response in Alaska should be cited to ARRT 2020.	Revised the citation to reference ARRT 2020.
7.	1-12	1.3		Why is Benzene not an issue with a diesel spill? It is a carcinogen and a mutagen when inhaled, having acute and chronic effects upon exposure.	Removed this statement.
8.	1-19	1.5.2		"When an ADEC Response Planning Standard (RPS) discharge occurs" Why not just say a discharge? Is it for exercise purposes only?	Changed language to simply "discharge".
9.	1-22, 1-23	1.6.3		The last sentence in paragraph two is cut off.	The partial sentence was removed.

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				This section provides information on aerial tracking capabilities for southeast Alaska but not Cook Inlet. Please add.	The name TEMSCO was capitalized. Also, added information on aerial tracking capabilities for Cook Inlet.
10.	1-25	1.6.5	18 AAC 75.449(a)(6)(G)	Please include reference to DEC Geographic Response Strategies for SE Region: https://dec.alaska.gov/spar/ppr/response-resources/grs/southeast/ It's mentioned in section 3.9.4 and 3.9.3	Added a reference to ADEC GRS for both Southeast and Cook Inlet regions.
11.	1-29	1.6.10		Recommend the following edits to the statement "They have contracts with wildlife responders recognized in Alaska and are authorized with the capacity to implement primary, secondary, and tertiary response" because the word "authorized" implies that the responders already have permits or authorizations to conduct these activities.	Revised language per request.
12.	1-30	1.6.10		Delete "marine" in the statement "Under these laws and regulations, it is illegal for anyone to take or handle marine wildlife except personnel from the responsible government entities or individuals authorized to take or handle marine wildlife by the proper authorities" because this statement is true for terrestrial species as well (fourth paragraph).	Removed the word "marine" from the referenced phrase.
13.	1-32	1.6.12.1, Southeast Alaska region, Skagway ADEC RPS Scenario		Why is ADEC included in the title of a section for P49's vessel and response capabilities?	Vessels that transport oil are also required to maintain Vessel Response Plans (VRPs) in accordance with 33 CFR 155, Subpart D, as regulated by USCG. VRPs include spill response planning scenarios with specific discharge volumes and planning criteria that differ from ADEC's requirements. Distinguishing the spill scenarios in the ODPCP as "ADEC RPS scenarios" allows Petro Marine to efficiently conduct the necessary exercises to

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					satisfy each agency's applicable regulations. No changes made.
14.	1-37	1.6.12.1		Day 2 The Resources Summary (Part 7 of the ICS 201) indicates that International Bird Rescue and International Wildlife Research staff will both arrive by 0800 on Day 2. Consider adding information to TF-8 for this day that the wildlife contractors are on scene.	Added arrival of wildlife contractors for TF-8 on Day 2.
15.	1-53	1.6.12.1		ICS 232 3. Environmentally Sensitive Areas and Wildlife Issues Pullen Creek is not catalogued for Chinook salmon.	Removed chinook under site issues for Pullen Creek. Corrected the spelling of Taiya River.
				Correct the spelling of Taiya River.	
16.	1-59	1.6.12.2, Cook Inlet Region, Seward ADEC RPS Scenario		Why is ADEC included in the title of a section for P49's vessel and response?	See response to RFAI #13. No changes made.
17.	1-64	1.6.12.2		Day 2 The Resources Summary (Part 7 of the ICS 201) indicates that personnel from International Bird Rescue and the Alaska SeaLife Center will be mobilized at 0800 at Day 2. Consider adding information to TF-8 for this day that the wildlife contractors are on scene.	Noted that wildlife contractors arrive on scene.
18.	1-80, App D	1.6.12.2, App D		ICS 232 3. Environmentally Sensitive Areas and Wildlife Issues The Site Issues column should describe the environmentally sensitive areas and wildlife intended	Revised the site issues to describe the environmentally sensitive areas and wildlife intended to be protected in the listed locations.

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	8			to be protected at these sites, not a description of the tactics that will be used for protection. Consider referencing the GRS for Thumb Cove and	Also added information for Eldorado Narrow/Cape Resurrection (CI-SZ-34) as requested. Added a copy of the GRS to Appendix D.
				Humpy Cove, and adding Eldorado Narrow/Cape Resurrection (CI-SZ-34) as a third site.	to rippelials D.
19.	1-87	1.6.13	18 AAC 75.449(a)(10)	"the IMT would assess if additional notifications beyond what is required for an ADEC RPS spill scenario are necessary"	See response to RFAI 13. No changes made.
				Again, why not just say a discharge? Are the procedures only for exercise purposes only? Please remove other instances stating "ADEC RPS spill scenario" and simply state it's a hypothetical scenario to demonstrate response capabilities to address a spill?	
20.	3-4	3.1.5	18 AAC 75.025	For the portion of Protective Booming, it is not required per the regulation unless it is offloading or taking in crude, other persistent products, and oily ballast water.	Removed the line pertaining to Protective Booming as it is not required for transfer of non-crude/non-persistent products.
21.	1-9, 1-19, 3-6	1.2, 1.5.2, 3.3.1		If a spill were to occur in locations elsewhere than nearby Taiya Inlet and Cook Inlet area, who is the incident commander to perform the duties?	Noted that, "While underway the vessel master would assume the role of initial Incident Commander." Also, revised language in Sections 1.2 and 1.5.2 to align with this change. While making this change in Section 1.5.2 also corrected a reference to the QI that should have been initial IC.
22.	3-7	3.3.2		Think leaving in the caveat that spill location and logistics would be the primary determination in deciding what would be an incident command post. For planning and discharge exercise purposes, what's in place is fine.	Acknowledged. No changes made.
23.	3-24	3.8		3 rd paragraph, "The Plant Manager is responsible for ensuring that every employee" Is this a typo, or for	Added language in Section 3.8 indicating that the Vessel Master is

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				the Cook Inlet and Skagway plant managers to ensure spot charter tankermen are trained? 4 th paragraph states the officer manager is responsible for maintaining records of all training provided to employees, is this true too for tankermen? Should it be the Vessel Master?	responsible for vessel crew training and record-keeping in accordance with company and state regulatory requirements.
24.	3-24 & 3- 25	3.8.1		Is this checked with each spot charter vessel when it's added, and performed before being added? Are records available with the Vessel Master?	See response to the RFAI above.
25.	3-30	3.9.1		Table 3.9-1 The life stages for the five salmon species is not accurate. Recommend reviewing the cited web pages and correcting (e.g., Chinook salmon do not spawn year-round and for all salmon species eggs are present from the time of spawning through the winter until spring). Gray whales are not listed under the Endangered Species Act, so footnote 1 should be removed. Caribou should have an 'X' for Sept-Dec since they are present year-round.	Corrected the life stages for the five salmon species per request. Footnote 1 deleted from Gray whale. Added 'X' to Caribou for Sept-Dec.
26.	3-31, 3-32	3.9.1		Table 3.9-2 Add 'N' to Shorebirds for June and July. Add 'X' to Chinook, coho, chum, and pink salmon for July and to sockeye salmon for June. The Southeast Alaska Northern Sea Otter Stock is not listed under the Endangered Species Act, so footnote 2 should be deleted.	Added 'N' to Shorebirds for June and July. Added 'X' to Chinook, coho, chum, and pink salmon for July and to sockeye salmon for June. Footnote 2 deleted from Northern Sea Otter. Black and brown bear information updated per request.

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				Black and brown bears are present year-round. Denning should be added to the fall through spring months.	
27.	3-34, 3- 35, 3-49	3.9.3, 3.9.4, and 3.11		Sections 3.9.3 and 3.9.4 cite ADF&G websites for information on Steller sea lions and Northern sea otters, but ADF&G is not the best source of information for these species; they are managed by National Marine Fisheries Service and U.S. Fish and Wildlife Service, respectively. The Endangered Species Act listings for these species are for the Western Distinct Population Segment of Steller sea lions and the Southwest Alaska Stock of Northern sea otters only. Recommend using the websites below for more information on these species. USFWS: https://ipac.ecosphere.fws.gov/ NMFS: https://www.fisheries.noaa.gov/resource/data/alaska-endangered-species-and-critical-habitat-mapper-web-application	Although ADF&G may not be the best source for this information, it is still a reliable source for accurate information and is easy to navigate and use. Retained references to ADF&G and added NMFS and USFWS references where applicable. Checked the USFWS and NMFS references and removed the Northern sea otters since the threatened Southwest Alaska Stock is found outside of the proposed vessel routes to both Skagway and Seward. Revised the cites for Steller sea lions to the listed NMFS reference and added this reference to the Bibliography.
28.	3-34	3.9.3		The plan lists five GRS in this section but states "There are three GRSs that overlap with the vessel route to Seward and operations at the Seward Bulk Plant (Appendix D), and they are listed below (ADEC 2025c)." Recommend rewording for clarity.	Changed the language to "There are five GRSs" to match the actual number listed.
29.	3-35	3.9.3		The Southcentral Stock of Northern sea otters, which are present in Resurrection Bay and eastern Cook Inlet are not listed under the Endangered Species Act. Only the Southwest Stock are listed and their range is western Cook Inlet southwest through the Aleutians.	Removed mention of Northern sea otters in both section 3.9.3 and 3.9.4 since neither the southcentral stock nor the Southeast Alaska stock are listed threatened or endangered.
30.	3-45	3.10.1		Correct SCAT to Shoreline Cleanup Assessment Technique.	Revised.

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			Regulation		
#	Page	Section	18 AAC 75.###	Comment/Recommendation	Plan Holder Response
31.	4-10, 4-	4.4, 3.10.1		Page 1.29 in Section 1.6.10 states that SEAPRO has a	Added International Wildlife Research
	11, and 3-			contract with International Wildlife Research.	to this section, including in Table 4.4-1
	45			Recommend including that response contractor in this	(also added IWR to the list of acronyms
				section, including in Table 4.4-1.	in Section 3.10.1).
	5-1	5.0	18 AAC 75.453,	Needs to show RPS calculations based upon highest	Added calculations for RPS of highest
32.			18 AAC 75.440	expected capacities for the specific regions.	expected capacities for Southeast and
			10 AAC / 3.440		Cook Inlet Regions.

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