

***To assure that your comments are addressed, the excel matrix provided by the Area Committee should be used to correlate and submit your or your organizations comments. While the matrix may be used to submit global comment, it is intended to add specificity regarding plan information and content as it is necessary for efficient consideration and processing by the Area Committee and Agency Planners.***

## **Comment Matrix Instructions**

This form provides stakeholders with a template for commenting on the draft version of the AWA ACP. For comments to be efficiently considered, reviewers are to consolidate their comments into the matrix provided. To ensure your comments are addressed, we ask that you do the following:

- 1** Complete the information on the Comments Matrix including Name(s) and Organization. Organizations with multiple commenters may submit forms for each commenter or consolidate one matrix for the organization. If desired, contact information may be submitted in the event that clarification is needed by agencies during the comment resolution phase.
- 2** Use the Excel form provided in the "Comment Matrix" Tab of this workbook.  
The use of the form provides multiple agencies the ability to consider and address comments received in an efficient and timely manner.
- 3** Enter each comment on a separate row providing all of the requested information. Requested information includes:
  - Numbered Comment
  - Name
  - Organization
  - Section #
  - Page #
  - Line #
  - Specific Wording Change or Comment
  - Rationale for Recommended ChangeIf there is a reference or supporting documentation, please cite it.
- 4** Be specific and clear about what you want to be considered for change in the existing text. Reviewers are encouraged to submit comments and proposed language revisions that begin with an action verb.
- 5** Provide a rationale for the recommended change; be clear about why it should be changed.
- 6** Email your completed comment matrix to [decsparplanning@alaska.gov](mailto:decsparplanning@alaska.gov).

<b>No.</b>	<b>Point of Contact</b>	<b>Organization/ Commenter</b>	<b>Section #</b>	<b>Page #</b>	<b>Line #</b>
1	Vinnie Catalano	CIRCAC	1100 - Introduction	1-2	30
2	Vinnie Catalano	CIRCAC	1210 - Geographic Planning Boundaries	1-4	4-5
3	Vinnie Catalano	CIRCAC	1220.1 - FOSC	1-7	26-30
4	Vinnie Catalano	CIRCAC	1410 - SONS	1-10	17-Jan
5	Vinnie Catalano	CIRCAC	1440.3 - TOSC	1-12	20-Jan
6	Vinnie Catalano	CIRCAC	1440.3 - TOSC	1-12	9-12
7	Vinnie Catalano	CIRCAC	1440.3 - TOSC	1-12	14
8	Vinnie Catalano	CIRCAC	1440.3 - TOSC	1-12	21
9	Vinnie Catalano	CIRCAC	1440.4 - Local Role	1-13	12-13
10	Vinnie Catalano	CIRCAC	1460.1 - NPREP	1-15	27
11	Vinnie Catalano	CIRCAC	2460 - Other Stakeholders	2-9	19

<b>No.</b>	<b>Point of Contact</b>	<b>Organization/ Commenter</b>	<b>Section #</b>	<b>Page #</b>	<b>Line #</b>
12	Vinnie Catalano	CIRCAC	4880 - Permits	4-8	6
13	Vinnie Catalano	CIRCAC	9710.3 – Cook Inlet	9-10	30
14	Vinnie Catalano	CIRCAC	9710.3.2 – Cook Inlet Logistics	9-10	31

<b>No.</b>	<b>Point of Contact</b>	<b>Organization/ Commenter</b>	<b>Section #</b>	<b>Page #</b>	<b>Line #</b>
15	Vinnie Catalano	CIRCAC	9710.3.2 – Cook Inlet Logistics	9-14	32
16	Vinnie Catalano	CIRCAC	9710.5.1 – Kodiak Island General Description	9-15	36
17	Vinnie Catalano	CIRCAC	9710.5.2 – Kodiak Island Risk Assessment	9-17	36
18	Vinnie Catalano	CIRCAC	9710.5.2 – Kodiak Island Risk Assessment	9-17	1

No.	Point of Contact	Organization/ Commenter	Section #	Page #	Line #
19	Vinnie Catalano	CIRCAC	9710.5.2 – Kodiak Island Risk Assessment	9-17	3
20	Vinnie Catalano	CIRCAC	9710.5.2 – Kodiak Island Risk Assessment	9-17	31
21	Vinnie Catalano	CIRCAC	5400 – COMMUNICATIO NS	5-7	186
22	Vinnie Catalano	CIRCAC	5400 – COMMUNICATIO NS	5-7	186
23	Vinnie Catalano	CIRCAC	5400 – COMMUNICATIO NS	5-7	186
24	Vinnie Catalano	CIRCAC	5400 – COMMUNICATIO NS	5-7	186

## Specific Wording Change

## Rationale for Recommended Change

Remove references to vessels and offshore facilities

Not relevant to Inland Plan (or, if it is relevant, describe significance)

Delete "This ACP encompasses the Coastal Zone, specifically the coastal area established within the Sector Anchorage COTP Zone."

Not relevant to Inland Plan (reference to "Sector Anchorage COTP Zone" also confusing as this is not a COTP Zone).

Suggest adding further discussion of how the determination would be made that two FOSCs were needed. Suggest also that this should be addressed in the RCP

Oil could move between other areas as well (e.g., PWS to AWA) or DOD vessel to one of the three coastal areas. Regulation cited states that it will be addressed in both RCPs and ACPs. Suggest should be addressed in RCP.

add "and Tribal leaders" (to list of gov't representatives that could be involved in strategic coordination of a SONS)

Tribes are listed in the preceding sentence of the paragraph but left out here

Change to "Participate in regular meetings of the Inland Area Committee"

Remove reference to AWA Area Committee

Suggest changing to: "The ARRT and the Inland Committee are directed to work with area tribes to help identify a TOSC. Tribes are strongly urged to work with the ARRT and/or the Inland Committee to predesignate the TOSC position. "

Use more direct language

Add language to clarify who makes such a request and on what basis it is approved or denied

Improve clarity

Capitalize "Joint Information Center" in 5th bullet

Suggested grammatical edit that aligns with common ICS terminology

change "an multi-agency coordination group" to "a multi-agency coordination group."

Suggested grammatical edit

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.

Change first instance of RSC to Regional Stakeholder Committee and incorporate description into plan itself as in AWA and PWS Area Plans

This is the first instance of the "RSC" acronym, should use full name and requires further explanation within the plan itself.

### **Specific Wording Change**

Remove references to Dispersant Use Avoidance Areas in information box below title

Add section: "Oil Activities." Suggested introductory paragraph pasted here, but this should be expanded greatly, with specific information on facilities that pose higher risks. "In addition to the oil and gas activities in Cook Inlet itself, there is extensive oil and gas infrastructure in the inland region, including operating oil and gas fields, pipelines, and a refinery. In the Northern Kenai Peninsula, activity is ongoing at the Swanson River unit and nearby areas. On the west side of Cook Inlet, there is extensive development around the Tyonek area. In Nikiski, there is the Marathon Oil Refinery. Natural gas pipelines and infrastructure are extensive around most of Cook Inlet, from the Tyonek area, through Anchorage and down to the Kenai Peninsula, supplying heat to individual buildings and energy to power plants. Some of the smaller communities have oil storage for backup power plants, such as Port Graham and Seldovia. Due to the extensive inland oil infrastructure, the Cook Inlet region has a relatively large potential for an inland spill."

Cook Inlet contains Alaska's most urban areas as well as some of its most remote. Between Anchorage and Homer, all communities are road-connected, services are widely available, and personnel and equipment can be transported on the highway. In contrast, there are several small communities on the south side of Kachemak Bay (Nanwalek, Port Graham, Seldovia, and Halibut Cove), as well as Tyonek on the west side, that are only reachable by boat or small plane. The southwestern shore of the Inlet is even more remote.

### **Rationale for Recommended Change**

Dispersant Use Avoidance Areas are not relevant to the Inland Plan as they are all marine areas. Other references to dispersant use through the plan should be checked for applicability.

Unlike for other regions, the Cook Inlet section has no information on oil and gas activities. Given the extensive nature of these activities, and the potential for spills related to them, this section should be greatly expanded. Inland spills are probably more likely in the Cook Inlet region than in most other Inland regions of the state. This section should include detailed information about oil storage facilities and infrastructure that could produce significant spills. In general, the Cook Inlet description requires significant additional information.

Expand on logistical constraints. The Cook Inlet region is the most diverse in the state, containing both Anchorage and remote villages. Greater specificity would be helpful.

## Specific Wording Change

[General revision requested]

Replace "Coastal Resources" heading with "Ecologic Resources" and delete up to the middle of line 42, leaving a paragraph that begins with: "The rivers, lakes and streams....."

Delete "and/or vessel traffic. Considerable vessel traffic transits the waters of the Kodiak Island Geographic Zone, ranging from small fishing and recreational vessels to large oil tankers and freight vessels. Both crude (though uncommon) and refined oil products are shipped through the waters adjacent to Kodiak Island. In addition, Liquefied Natural Gas, and crude oil tank ship traffic in Cook Inlet and PWS pose a threat to Kodiak Island and its adjacent waters."

Delete "for the purpose of this plan" from this sentence: "These categories of spill risk have been qualitatively analyzed for the purpose of this plan, and include the following possibilities:"

## Rationale for Recommended Change

The section on portable restrooms is oddly specific, and oddly limited. If a listing of particular service providers is deemed helpful, other service providers (transportation, food, communications, etc...) should be listed as well.

Coastal resources are out of scope of an Inland plan, which includes only areas 1000 yards or more from shore. The latter half of this section talks about rivers, lakes, bears, etc... so is appropriate, but marine mammals and cliff-nesting birds are not.

Not relevant to Inland Plan. References to vessel spills should be removed throughout.

Copy-pasted from another plan, does not appear to be this one



## Specific Wording Change

## Rationale for Recommended Change

Delete: "Crude oil tanker spills in adjacent waters; "" Crude oil tanker spills originating in PWS or Cook Inlet; "" Operational spills from fishing vessels during refueling; "" Fishing vessel-source spills due to vessel casualties; ", "Freight vessel non-persistent spills due to casualties or groundings;"" Freight vessel bunker fuel spills due to casualties or groundings; ""Operational spills from tank vessels during refueling at Kodiak facilities; ""Tank vessel non-crude spills which result from casualties or groundings;" and " Fish processing vessels with hazardous substances (ammonia/chlorine)."

Deleting all the marine spill types, leaving only inland possibilities

Delete first two bullet points, referencing fishing vessels and freight vessels, as well as the second to last bullet referencing crude oil tank ships

Leaving only inland spill types

Landline section reads: "Telephone, data, and fax. Telefax communications can be used where data is limited." Delete all but "Telephone."

Fax machines are no longer used. Documents can be sent electronically.

Add new line to table: "Electronic" Description: "Documents may be sent electronically to community agencies. Additionally, many small communities have social media outlets (i.e. Facebook groups), that allow for rapid dissemination of information to the community."

Updating for modern communications technology

In "Cellular" section, edit Limitations to read: "Service in many locations is limited due to terrain. In remote communities, cell service is often available only through a single provider, meaning that cell phones from outside responders may not work at all."

Correcting

in "Satellite" edit Limitations to read: "Service in many locations is limited due to terrain, latitude, and weather"

Adding missing word

No.	Section #	Specific Wording Change	Rationale for Recommended Change
1	1100 - Introduction	Remove references to vessels and offshore facilities	Not relevant to Inland Plan (or, if it is relevant, describe significance)
2	1210 - Geographic Planning Boundaries	Delete "This ACP encompasses the Coastal Zone, specifically the coastal area established within the Sector Anchorage COTP Zone."	Not relevant to Inland Plan (reference to "Sector Anchorage COTP Zone" also confusing as this is not a COTP Zone).
3	1220.1 - FOSC	Suggest adding further discussion of how the determination would be made that two FOSCs were needed. Suggest also that this should be addressed in the RCP	Oil could move between other areas as well (e.g., PWS to AWA) or DOD vessel to one of the three coastal areas. Regulation cited states that t will be addressed in both RCPs and ACPs. Suggest should be addressed in RCP.
4	1410 - SONS	add "and Tribal leaders" (to list of gov't representatives that could be involved in strategic coordination of a SONS)	Tribes are listed in the preceding sentence of the paragraph but left out here
5	1440.3 - TOSC	Change to "Participate in regular meetings of the Inland Area Committee"	Remove reference to AWA Area Committee
6	1440.3 - TOSC	Suggest changing to: "The ARRT and the Inland Committee are directed to work with area tribes to help identify a TOSC. Tribes are strongly urged to work with the ARRT and/or the Inland Committee to predesignate the TOSC position. "	Use more direct language
7	1440.3 - TOSC	Add language to clarify who makes such a request and on what basis it is approved or denied	Improve clarity
8	1440.3 - TOSC	Capitalize "Joint Information Center" in 5th bullet	Suggested grammatical edit that aligns with common ICS terminology
9	1440.4 - Local Role	change "an multi-agency coordination group" to "a multi-agency coordination group."	Suggested grammatical edit
10	1460.1 - NPREP	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.
11	2460 - Other Stakeholders	Change first instance of RSC to Regional Stakeholder Committee and incorporate description into plan itself as in AWA and PWS Area Plans	This is the first instance of the "RSC" acronym, should use full name and requires further explanation within the plan itself.
12	4880 - Permits	Remove references to Dispersant Use Avoidance Areas in information box below title	Dispersant Use Avoidance Areas are not relevant to the Inland Plan as they are all marine areas. Other references to dispersant use through the plan should be checked for applicability.

No.	Section #	Specific Wording Change	Rationale for Recommended Change
13	9710.3 – Cook Inlet	Add section: "Oil Activities." Suggested introductory paragraph pasted here, but this should be expanded greatly, with specific information on facilities that pose higher risks. "In addition to the oil and gas activities in Cook Inlet itself, there is extensive oil and gas infrastructure in the inland region, including operating oil and gas fields, pipelines, and a refinery. In the Northern Kenai Peninsula, activity is ongoing at the Swanson River unit and nearby areas. On the west side of Cook Inlet, there is extensive development around the Tyonek area. In Nikiski, there is the Marathon Oil Refinery. Natural gas pipelines and infrastructure are extensive around most of Cook Inlet, from the Tyonek area, through Anchorage and down to the Kenai Peninsula, supplying heat to individual buildings and energy to power plants. Some of the smaller communities have oil storage for backup power plants, such as Port Graham and Seldovia. Due to the extensive inland oil infrastructure, the Cook Inlet region has a relatively large potential for an inland spill."	Unlike for other regions, the Cook Inlet section has no information on oil and gas activities. Given the extensive nature of these activities, and the potential for spills related to them, this section should be greatly expanded. Inland spills are probably more likely in the Cook Inlet region than in most other Inland regions of the state. This section should include detailed information about oil storage facilities and infrastructure that could produce significant spills. In general, the Cook Inlet description requires significant additional information.
14	9710.3.2 – Cook Inlet Logistics	Cook Inlet contains Alaska's most urban areas as well as some of its most remote. Between Anchorage and Homer, all communities are road-connected, services are widely available, and personnel and equipment can be transported on the highway. In contrast, there are several small communities on the south side of Kachemak Bay (Nanwalek, Port Graham, Seldovia, and Halibut Cove), as well as Tyonek on the west side, that are only reachable by boat or small plane. The southwestern shore of the Inlet is even more remote.	Expand on logistical constraints. The Cook Inlet region is the most diverse in the state, containing both Anchorage and remote villages. Greater specificity would be helpful.
15	9710.3.2 – Cook Inlet Logistics	[General revision requested]	The section on portable restrooms is oddly specific, and oddly limited. If a listing of particular service providers is deemed helpful, other service providers (transportation, food, communications, etc...) should be listed as well.
16	9710.5.1 – Kodiak Island General Description	Replace "Coastal Resources" heading with "Ecologic Resources" and delete up to the middle of line 42, leaving a paragraph that begins with: "The rivers, lakes and streams....."	Coastal resources are out of scope of an Inland plan, which includes only areas 1000 yards or more from shore. The latter half of this section talks about rivers, lakes, bears, etc... so is appropriate, but marine mammals and cliff-nesting birds are not.
17	9710.5.2 – Kodiak Island Risk Assessment	Delete "and/or vessel traffic. Considerable vessel traffic transits the waters of the Kodiak Island Geographic Zone, ranging from small fishing and recreational vessels to large oil tankers and freight vessels. Both crude (though uncommon) and refined oil products are shipped through the waters adjacent to Kodiak Island. In addition, Liquefied Natural Gas, and crude oil tank ship traffic in Cook Inlet and PWS pose a threat to Kodiak Island and its adjacent waters."	Not relevant to Inland Plan. References to vessel spills should be removed throughout.

No.	Section #	Specific Wording Change	Rationale for Recommended Change
18	9710.5.2 – Kodiak Island Risk Assessment	Delete "for the purpose of this plan" from this sentence: "These categories of spill risk have been qualitatively analyzed for the purpose of this plan, and include the following possibilities:"	Copy-pasted from another plan, does not appear to be this one
19	9710.5.2 – Kodiak Island Risk Assessment	Delete: "Crude oil tanker spills in adjacent waters; "" Crude oil tanker spills originating in PWS or Cook Inlet; "" " Operational spills from fishing vessels during refueling; "" Fishing vessel-source spills due to vessel casualties; "" "Freight vessel non-persistent spills due to casualties or groundings;"" Freight vessel bunker fuel spills due to casualties or groundings;"" Operational spills from tank vessels during refueling at Kodiak facilities; ""Tank vessel non-crude spills which result from casualties or groundings;" and " Fish processing vessels with hazardous substances (ammonia/chlorine)."	Deleting all the marine spill types, leaving only inland possibilities
20	9710.5.2 – Kodiak Island Risk Assessment	Delete first two bullet points, referencing fishing vessels and freight vessels, as well as the second to last bullet referencing crude oil tank ships	Leaving only inland spill types
21	5400 – COMMUNICATIONS	Landline section reads: "Telephone, data, and fax. Telefax communications can be used where data is limited." Delete all but "Telephone."	Fax machines are no longer used. Documents can be sent electronically.
22	5400 – COMMUNICATIONS	Add new line to table: "Electronic" Description: "Documents may be sent over email to community agencies. Additionally, many small communities have social media outlets (i.e. Facebook groups), that allow for rapid dissemination of information to the community."	Updating for modern communications technology
23	5400 – COMMUNICATIONS	In "Cellular" section, edit Limitations to read: "Service in many locations is limited due to terrain. In remote communities, cell service is often available only through a single provider, meaning that cell phones from outside responders may not work at all."	Correcting
24	5400 – COMMUNICATIONS	in "Satellite" edit Limitations to read: "Service in many locations is limited due to terrain, latitude, and weather"	Adding missing word