



ALASKA DEPT OF  
ENVIRONMENTAL CONSERVATION



UNITED STATES COAST GUARD  
CAPTAIN OF THE PORT PRINCE WILLIAM SOUND



USEPA (REGION X)  
ALASKA OPERATIONS OFFICE

October 5, 2005

Ms. Pamela Bergmann  
Regional Environmental Officer-Alaska  
Office of Environmental Policy and Compliance  
U.S. Department of the Interior  
1689 C Street, Room 119  
Anchorage, AK 99501-5126

Re: Your Letter – June 30, 2005

Dear Ms. Bergmann:

Thank you very much for your input on the public review draft of Change 2 to the Prince William Sound Subarea Contingency Plan. We received pertinent comments from two other organizations. Your comments will certainly contribute to further enhancing the overall plan, and we have incorporated the majority of them into the final version of Change 2.

We convened a work group consisting of representatives from the U.S. Coast Guard, EPA, and the Alaska Department of Environmental Conservation to review all of the comments submitted during the public review process.

The group reviewed and addressed your proposed recommendations, and our responses to several of your specific comments are included in the attached. Our comments are provided by exception, and those comments that you provided which are not specifically listed in the attached have been incorporated into the final document.

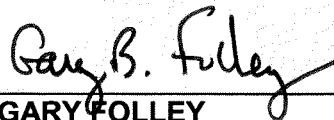
Thank you again for participating in the plan review process. We certainly appreciate the time and effort put forth by you and your staff in reviewing the draft. We hope to continually improve the PWS subarea plan and we sincerely appreciate your constructive comments.



**CARL LAUTENBERGER**  
Subarea Committee Co-Chair  
Federal On-Scene Coordinator, USEPA  
Region 10 (Alaska Operations Office)



**CDR MICHAEL GARDINER**  
Subarea Committee Co-Chair  
Federal On-Scene Coordinator, USCG  
Captain of the Port, Prince William Sound



**GARY FOLLEY**  
Subarea Committee Co-Chair  
State On-Scene Coordinator, ADEC  
Central Alaska Response Team

cc: Leslie Pearson, ADEC PERP Program Manager  
Mitch Deely, Seventeenth Coast Guard District  
Larry Iwamoto, ADEC PERP Prevention Section Manager  
Mary Goolie, EPA Region 10, Alaska Operations Office  
Cathy Huot, MSO Valdez

Encl: Response to Specific Comments

## Response to Specific Comments

Comment: Page x. The last paragraph in this section needs to be revised to reflect, in accordance with the *National Contingency Plan*, that the Alaska Regional Response Team (Alaska RRT) has an approval role in the promulgation of the *Unified Plan* and revisions to the *Unified Plan*.

Response: The language in this paragraph is consistent with the Unified Plan, Annex D, page D-5 diagram. The process calls for “Alaska Regional Response Team review and concurrence”, as stated in this paragraph.

Comment: Page A-15, Hours 96, Full Response Team. The sentence “The Full Response Team will follow the command structure described in the Alaska Incident Management System (AIMS) Guide” needs to be deleted, since the AIMS Guide has not been endorsed, or adopted by, the Alaska Regional Response Team (ARRT), and it is our understanding that the USCG will be using the *U.S. Coast Guard Incident Management Handbook*.

Response: The sentence has been re-worded as follows:

“The Full Response Team will follow the command structure described in the Alaska Incident Management System (AIMS) Guide and/or the U.S. Coast Guard Incident Management Handbook.”

Comment: Page E-17, Federal Response Action Priorities/Strategies, Priority Four, sentence 2. This sentence, which states that “It may be necessary to sacrifice some areas in order to achieve the best overall protection of the environment.” needs to be deleted, unless all Federal and State natural resource trustees agree it is appropriate to include as “Priorities/Strategies” section.

Response: This is a potential option as indicated by the word “may.” In the event of a major spill release, this is a condition that may arise. Consultation with the natural resource trustees will be an immediate task for the Unified Command, and the advice of the trustees will be weighed seriously in arriving at a decision. Despite all of the pre-planning and innovations in spill response technology, a major spill event will require the Unified Command to review all potential options to reduce the impact to exposed resources. This is just one of several options that will need to be considered, and should remain in the document.

Comment: Page E-17, Federal Response Action Priorities/Strategies, Priority Five. As stated in the above comment, reference to the use of “Sacrificial Areas” needs to be deleted, or all Federal and state natural resource trustees agree it is appropriate to include.

Response: See above.

Comment: Page E-18, Federal Response Action Priorities/Strategies first full paragraph: This paragraph needs to be revised to describe the Shoreline Cleanup Assessment Team process that is used in spill response in Alaska.

Response: The Unified Plan, Annex N, provides a list of the guidance documents for this process. To our knowledge, there is no standard SCAT process that has been adopted for the State of Alaska. As an example, during the M/V Seladang Ayu response, several new terms were coined (e.g., PEST, NOIT, etc.) which are not generally acknowledged in any of the standard guidance documents.

Comment: Page E-18, Federal Response Action Priorities/Strategies, second paragraph, last sentence 2. As written, this sentence is confusing, since it is unclear what "...site-specific guidelines for source protection measures..." would be provided by the Alaska RRT. The sentence needs to be either clarified or deleted.

Response: This sentence has been re-worded and reference to the Alaska RRT has been removed.

Comment: F-18, B Maximum Most Probable Case. We believe this section needs to be re-written, describing a future, rather than a past, maximum most probable spill scenario, as was done for the "worst case" coastal oil spill.

Response: This section was written in accordance with Coast Guard area planning guidance (COMDTNOTE 16471) which states: "The maximum most probable discharge scenario in most cases will be based on the largest recorded spill size for the area." Therefore, the reference to the Exxon Valdez Oil Spill as the maximum most probable discharge scenario is consistent with the federal guidance document.

### **Potential Places of Refuge Section**

Comment: Key to the Site Assessment Matrix. Under the column "Sensitive Resources," delete the three phrases (which are the first 3 rows under the column) regarding reporting, inspecting, and monitoring of historic properties. The column would then only include the phrases regarding threatened or endangered species, and highly sensitive areas.

Comment: PPOR Maps 01 through 16. Delete the row "Historic Property" under "Site Considerations" on the second page of each of these maps.

Response: We have reviewed this specific comment and have several concerns. The language in the PPOR Site Assessment Matrix regarding historic properties is the same standard language used for the more than 250 Geographic Response Strategies developed and approved for SE Alaska, Cook Inlet, Prince William Sound, and Kodiak.

In the GRS Site Selection Matrix, the following codes are used:

S = Standard (Report any cultural resources found during operations to the FOSC Historic Properties Specialist)

I = Inspection (FOSC Historic Properties Specialist should inspect site prior to operations)

M = Monitor (FOSC Historic Properties Specialist should monitor on-site operations)

For the PWS PPOR Section, the following codes are used in the Site Assessment Matrix:

R = Report Cultural Resources if discovered during operations to the FOSC Historic Properties Specialist

I = The segment should be inspected by FOSC Historic Properties Specialist prior to or concurrent with operations.

M = Sensitive Cultural Resources are known to be present and FOSC Historic Properties Specialist monitor should be present during operations.

At the outset of the PPOR development for Prince William Sound, one of the overarching principles was to use the process applied in developing the GRS for the subareas of the State.

This proposed change will incur additional costs to modify this contractor-developed document, and DEC as the sole, funding organization for this project has exhausted available funding. Additionally, the existing terminology is consistent with that used in GRS development and DEC, EPA, and the Coast Guard agree that this change is not warranted.

Comment: PPOR Map Tables identifying stakeholder contacts. It is our understanding that the PPOR Work Group agreed that the detailed contact information on each PPOR map table would be deleted. We have examined the proposed replacement PPOR document, which is posted on the web site:

<http://www.dec.state.ak.us/spar/perp/pwspor/home.htm>.

We believe the proposed replacement table of possible stakeholders needs additional revision, since the information included under the column "Contact" would not be helpful to users of the table. We recommend leaving the list of stakeholders in Column 1, and identifying in Column 2 where in the PWS SCP contact information is found for each stakeholder. For example, for PPOR-01 Port Valdez Stakeholders, first column would identify: "U.S. Department of the Interior." The column labeled "Contact" would read: "See Resource Section, Tab T."

Comment: All references on the PPOR Maps to "Department of the Interior" should be corrected to read: "U.S. Department of the Interior".

Comment: The "title" opposite the detailed nautical chart of each PPOR graphic needs to be revised to read: "Potential Places or Refuge."

Response: Changes of this nature will require renewal of the contract to have these documents re-accomplished. The DEC budget for this project has been totally expended. Unless other parties are willing to fund these additional changes, we will forego making these changes until sometime in the future when funding may become available.