

Anchorage Waterways Council

Please see uploaded comments. Thank you.



ANCHORAGE WATERWAYS COUNCIL

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Comments to proposed “Oil Discharge Prevention and Contingency Plan Public Scoping” March 16, 2020

With the perspective of the 1989 *Exxon Valdez* oil spill, we Alaskans expect to live, work and play in a healthy natural environment that depends on oil free beaches, waters, wildlife and seafood. After the *Exxon Valdez* oil spill, citizens and the Alaska Legislature worked together to enact the strongest oil spill protection laws in the nation to keep our waters, beaches, fish and wildlife oil free. These regulations have been revised on numerous occasions over the past 30 years for clarification and streamlining, and to make contingency planning and review less cumbersome, more predictable and expeditious. Industry compliance with these laws is social license for economic development in Alaska, and industry has successfully complied with these laws and regulations for 30 years.

After the 1989 *Exxon Valdez* oil spill, Congress cited complacency on the part of industry and regulators as a key contributing factor to the spill. Anchorage Waterways Council (AWC) believes that combatting this complacency and rebuilding trust must involve the public who are those with the most at risk in the event of a large spill. This includes decisions that affect the safe extraction and transportation of hydrocarbons.

Contingency Plans are industry’s commitment to Alaskans that they are prepared to effectively respond in the event of a significant future catastrophic spill or situation, and Contingency Plans are a critical component of ensuring the safe transportation, production and exploration of oil and represent rigorous but achievable standards.

AWC believes regulatory review should benefit all businesses: from subsistence and food security to commercial fisheries and tourism, and that clean waters and coasts are vital to the state. We also believe that rolling back or eliminating proven oil spill prevention and response requirements to reduce a perceived burden to industry transfers the risk and burden of another oil spill onto the backs of our communities, citizens, businesses, and the environment.

AWC understands that the Commissioner of the Department of Environmental Conservation informed the Board of the Cook Inlet Regional Citizens Advisory Council (CIRCAC) that the Department has no desire whatsoever to roll back the environmental protections in place and that preparedness and protection are vital. Given these circumstances, AWC supports regulatory changes that would improve Alaska’s spill response capability, and will oppose any attempts to weaken or dismantle Alaska’s oil spill prevention and response system as unacceptable.

Sincerely,

Isaac Watkins, Board President

Xc: CIRCAC