

Prince William Sound Audubon Society

I am submitting the following comments on behalf of the Prince William Sound Audubon Society regarding our opposition to changes to the Alaska oil spill regulations (18 AAC 75, Article 4) and Alaska State Statute 46.04 (AS 46.04), Oil and Hazardous Substance Pollution Control.

The Prince William Sound Audubon Society is based in Cordova and represents a membership primarily from Cordova, but also from throughout the Prince William Sound region. The mission of our Society as well as of Audubon Alaska is to conserve Alaska's natural ecosystems focusing on birds, other wildlife, and their habitats for the benefit and enjoyment of current and future generations.

Prince William Sound Audubon Society strongly opposes any legislative or regulatory changes that would erode oil spill prevention and response standards, increase the risk of a catastrophic spill, or demonstrate a return of the complacency on the part of the oil industry and regulators that Congress determined to be a primary cause of the Exxon Valdez oil spill.

Oil Spill Contingency plans are not overly long or complicated, as alluded to by industry. The length of the regulations is to provide details for the wide variety of operations, including crude tankers, non-crude tankers and barges, crude oil terminals, non-crude terminals, oil and gas exploration facilities, production facilities, pipelines, and railroad tank cars. Many of the details in c-plan regulations were adopted over time to provide guidance and predictability to industry. There is no "one size fits all" plan; each plan is only as long as it needs to be to include enough details on how prevention and response actions are to be carried out so that there is no ambiguity.

Industry has shown they have been able to meet or exceed current regulatory requirements, and has demonstrated a commitment to the environment through safer operations, while operating profitably for the last 30 years. Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) has concerns that the current review and reform is an effort to roll back regulations in order to cut costs for the oil industry, effectively shifting the burden from oil industry to the people, fish, wildlife, environment, and to the many industries, as well as cultural practices, which rely on them.

Prevention is always the best practice when considering actions that could have devastating consequences upon environmental and economic health of an area whose value extends far beyond the shores of Prince William Sound in terms of recreation, tourism, commercial fishing, and quality of life.

Respectfully,

Mary Anne Bishop, Ph.D.
President, Prince William Sound Audubon Society

Milo Burcham
Vice President, Prince William Sound Audubon Society

Kate McLaughlin
Sec./Treasurer, Prince William Sound Audubon Society

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March 14, 2020

To: Alaska Department of Environmental Conservation

Re: Comments proposed changes to Alaska oil spill regulations (18 AAC 75, Article 4) and Alaska State Statute 46.04 (AS 46.04), Oil and Hazardous Substance Pollution Control

To whom it may concern:

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Mary Anne Bishop, Ph.D.
President, Prince William Sound Audubon Society

For the birds