

Kachemak Bay Conservation Society

Please accept attached comments from Kachemak Bay Conservation Society



Kachemak Bay Conservation Society

3734 Ben Walters Ln, Homer, AK 99603

907 235.8214

kbayconservation@gmail.com

Allison Natcher

Alaska Department of Environmental Conservation

555 Cordova Street

Anchorage, AK 99501

Via email: allison.natcher@alaska.gov; decsparplanning@alaska.gov, [online portal](#)

RE: Comments on the Alaska Regional Contingency Plan Public Review Draft, June 2021

Dear Ms. Natcher:

The Kachemak Bay Conservation Society (KBCS) is a non-profit corporation that was formed in 1982 to protect the environment of the Kachemak Bay region and greater Alaska by encouraging sustainable use and stewardship of natural resources through advocacy, information and collaboration.

KBCS has reviewed the version of the Alaska Regional Contingency Plan (RCP) that was posted for public review in June 2021. Though we do not profess to be subject experts, we do notice changes that have caught our attention. Having been a mature organization in 1989 and lived through the Exxon Valdez episode and other incidents around Alaska we have a deep understanding of public involvement and issues.

Please accept our following comments on the Plan:

1. The Regional Contingency Plan should set policy, and changes among the Area Contingency Plans (ACPs) and should be transparent to the public.

Transparency is critical to stakeholder involvement in contingency planning. How issues are addressed and resolved at this level of planning should be clear and straightforward. Decision-making done in a transparent process can foster trust among government, industry, and citizens. This should adequate time for public comment periods for all Area Contingency Plans and NOT using just two ACP comments to drive changes for all four.

2. The Regional Stakeholder Committees have been developed specific for Alaska and provide a meaningful avenue for stakeholder participation through a liaison officer to the Incident Commander, (IC). This is a two way street for communication in a controlled environment which would benefit the IC and stakeholders. The RSC is a DISTINCT and different entity from a Multi Agency Coordinating Committee as described on page 55, line 5. When stood up, an RSC can communicate with and represent the listed entities providing a valuable and organized means to disseminate information in both directions. The RSC as described on page 56, line 30, is not correct, as its structure is NOT in line with a MAC. KBCS sees the value in the RSC and as such, it should be a stand-alone committee of the Plan and we strongly disagree with the language that the IC can employ either an REC or MAC. The Plan should identify the value of both these groups and the word either on page 55, line 4, should be struck and the word "AND" added after MAC.

3. In conclusion KBCS strongly endorses all comment made by RCACs that represent the effected areas from the Exxon Valdez Oil Spill. Lessons learned must have their place in Plans and not be forgotten.

Thank you for the chance to comment on the ARC Plan and we are available to answer any questions.

Respectfully,

Roberta Highland

President, Kachemak Bay Conservation Society