

Rebecca Siegel

I am a concerned Alaskan. I care deeply about the lands and waters of our state. I have some grave concerns about the Alaska Department of Environmental Conservation regulatory reform package.

I believe that the minimum number of exercises required for crude oil plans should be set at one significant Incident Management Team and two field deployment exercises per year, as well as other unannounced exercises as ADEC deems necessary. Regulations should also retain the commitment that if a plan holder fails to demonstrate the ability to implement their plan, ADEC will require additional exercises or take other appropriate action.

Furthermore, ADEC and the State of Alaska should lead the way in terms of staying informed and promoting best available technology. Regulatory changes should not result in any diminished emphasis on best available technology, including retaining the requirement that a BAT conference be held every five years or otherwise stating how they will examine new technologies to meet the mandates of AS 46.04.030(e).

The regulations should continue to name the RCACs for Cook Inlet and Prince William Sound as recipients required to be notified of plan reviews, updates, and amendments, electronically or otherwise.

Federal law, the Alaska Oil Spill Commission, and the Alaska Department of Environmental Conservation all recognize the RCACs' special role in reviewing contingency plans.

The regulations should adopt the International Maritime Organization (IMO) standards for emergency towing arrangements is appropriate, but with the additional requirement that tankers calling at the Valdez Marine Terminal be able to deploy the arrangement from the forward (bow) position in 15 minutes.

Finally, I applaud the improvements to the regulations, including gains in clarity and useability, previously redundant sections of regulation combined, and modernization of workflow.

Thank you.