

Prince William Sound Audubon Society

January 31, 2022

To: Alaska Department of Environmental Conservation

Re: Comments on proposed changes to Alaska oil spill prevention requirements in the ADEC regulations

To whom it may concern:

I am submitting the following comments on behalf of the Prince William Sound Audubon Society regarding our concerns regarding the Alaska Department of Environmental Conservation’s proposed changes to regulations on oil spill prevention requirements and contingency plans. 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. While we appreciate the improvements to the proposed regulations, we are very concerned that the regulations do not go far enough or are lacking in clarity. Specifically, we request that the proposed regulations incorporate the following changes:

- 1) The required minimum number of exercises required for crude oil plans 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. If a plan holder fails to demonstrate the ability to implement their plan, that ADEC will require additional exercises or take other appropriate action.
- 2) Regulations specifically name both the Prince William Sound & the Cook Inlet Regional Citizens Advisory Councils (RCACs) as recipients required to be notified of plan reviews, updates, and amendments, electronically or otherwise.
- 3) The adoption of International Maritime Organization (IMO) standards for emergency towing arrangements, 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.
- 4) That the regulations emphasize that the State of Alaska will promote and use the best available technology to meet the mandates of AS 46.04.030(e).

We appreciate the opportunity to bring to ADEC’s attention our concerns and to request changes to the proposed regulations.

Respectfully,



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