

Kachemak Bay Conservation Society

Coastal Communities need robust oil spill protection and response. Spills can do permanent damage to our region. They can destroy our fisheries, our tourism industry, and our basic way of life. We are the ones who suffer the consequences. We need ADEC to make sure we are protected. Please see comments from Kachemak Bay Conservation Society on proposed changes to regulations attached.



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To Whom It May Concern:

- 1) We cannot clean up oil spills unless we have a well trained oil response team. The minimum number of exercises required for crude oil plans must be one significant Incident Management Team and two field deployment exercises per year, as well as other unannounced exercises. Regulations should 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.
- 2) We need to use the best available technology in the event of a spill. Regulatory changes should maintain the requirement that a BAT conference be held every five years or otherwise state specifically how they will examine new technologies to meet the mandates of AS 46.04.030(e).
- 3) We need to continue to engage our Citizen Advisory Councils! These are the people who will be most affected by a spill; these are the people who know the regions best. 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.
- 4) We do not want to see any relaxation in the standards for response time. The adoption of International Maritime Organization standards for emergency towing arrangements is appropriate, but we need an additional requirement that tankers calling at the Valdez Marine Terminal be able to deploy the arrangement from the forward position in 15 minutes.

Sincerely,

Roberta Highland
President, Kachemak Bay Conservation Society.