



January 28, 2022

Commissioner Jason Brune
Alaska Department of Environmental Conservation
P.O. Box 111800
Juneau, AK 99811

RE: Public comments regarding the notice of proposed changes to oil pollution prevention requirements in the regulations of the Alaska Department of Environmental Conservation.

Dear Commissioner Jason Brune,

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and on the Gulkana River, raising all five species of Pacific salmon for harvest by all user groups. We are writing to provide input to the Alaska Department of Environmental Conservation (ADEC) regarding the proposed regulation changes to oil pollution prevention regulations under Article 4 of 18 AAC 75.

PWSAC recognizes the ADEC's efforts to increase clarity, reduce redundant language, and modernized Alaska's workforce; however, PWS RCAC have brought up concerns that this reform initiative could result in changes that weaken the world-class oil spill prevention and response system in Prince William Sound, a body of water vital to local and state economy. Alaska's statutes and regulations have been in place for over 30 years, protecting Alaska and ensuring that industry and responders maintain vigilant in preventing and responding to spills. Industry has operated successfully with these safeguards in place and these statutes, and regulations are one of the main reasons Prince William Sound has not suffered a catastrophic oil spill since 1989. Any changes made to these regulations should not jeopardize the safety of Alaska's waters. As such, we ask the Commissioner to address the following concerns we share with the PWS RCAC.

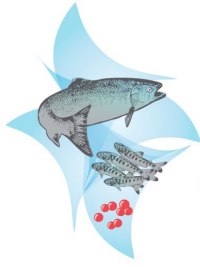
According to RCAC, the regulation changes could significantly reduce the frequency of exercises in the PWS area; this is of concern for our corporation. PWSAC asks the Commissioner to require the minimum number of exercises for crude oil plans to be set at one significant Incident Management Team and two field deployment exercises per year, and to perform unannounced exercises as necessary (as determined by the ADEC). PWSAC would also like to include a requirement of additional exercises for plan holders that fail to demonstrate the ability to implement their plan.

It is important to maintain a modern industry to increase safety and efficiency, and the State should promote the best available technologies to do so. At RCAC's recommendation, PWSAC would prefer to include language that ensures the State of Alaska and ADEC continue to hold BAT conferences every 5 years to stay informed about new technologies and equipment that could benefit Alaska's industry.

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Proposed regulations would change tow package requirements for tankers calling at the Valdez Marine Terminal. RCAC believes that with technological improvements since the early 1990s, it should be readily feasible for all tankers calling at the terminal to be outfitted with an improved Prince William Sound tow package that is both stronger and faster to deploy. PWSAC approves the adoption of International Maritime Organization (IMO) standards for emergency towing arrangements but would prefer 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.

Lastly, the regulation changes remove language that required review of contingency plans by Cook Inlet and PWS RCAC. PWSAC relies on RCAC to keep our corporation informed about major developments in regulations in our area and we ask that the regulations 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. We agree with the Alaska Oil Spill Commission and the Alaska Department of Environmental Conservation in their assessment of RCAC as important to the state system of citizen oversight.

Thank you for taking the time to review and consider our concerns.

Sincerely,

Geoff Clark
General Manager/CEO

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