



Kachemak Bay Conservation Society  
3734 Ben Walters Ln, Homer, AK 99603  
907 235.8214  
kbayconservation@gmail.com

January 31, 2022

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.