

Sylvia Kreel

The Alaska Department of Natural Resources (ADNR) appreciates the opportunity to comment on the request by the Alaska Department of Environmental Conservation (ADEC) to seek input on current spill prevention and response regulations and statutes, specifically those within 18 AAC 75, Article 4 regarding Oil Discharge Prevention and Contingency Plan (ODPCP) requirements, and any related statutes that authorize the Article 4 regulations.

The purpose of ODPCPs is not only to ensure that a plan holder has the financial ability and measures in place to prevent and respond to a release, but it also provides guidance to those involved in the response actions to effectively address a release. ODPCPs are specific to both the plan holder's operations and to the surrounding environment, to best minimize potential impacts from a release.

The ability to review ODPCPs and engage in associated spill drills and training is essential for ADNR. These opportunities establish clear communication channels between all involved agencies, outline informed processes to handle responses to various spill scenarios, and equip ADNR staff with the knowledge and experience required of such events to better contribute to a streamlined spill response that is timely and efficient.

ADNR supports 18 AAC 75, Article 4, and all related statutes that authorize the Article 4 regulations, as they are currently written, as it pertains to ADNR's mission to provide for the appropriate use and management of Alaska's state owned land and water, aiming toward maximum use consistent with the public interest.

Thank you for the opportunity to comment. Please contact me If you have any questions or need additional information.