

NORTH SLOPE BOROUGH

DEPARTMENT OF PUBLIC WORKS

P.O. Box 350

Barrow, Alaska 99723

Phone: 907-852-0489



Scott K. Danner, Director

January 21, 2022

Zuzana Culakova
Alaska Department of Environmental Conservation
410 Willoughby Ave, Suite 303
Juneau, AK 99811

Re: North Slope Borough Comments Towards ADEC Notice of Proposed Changes to 18 AAC 75 Part IV

Ms. Culakova:

The North Slope Borough (NSB / Borough) respectfully submits its comments pertaining to the draft 18 AAC 75 Part IV modifications, issued by the ADEC on October 28, 2021. Our comments are detailed in the attached table.

The Borough does appreciate and support the Alaska Department of Environmental Conservation (ADEC's) attempts to clarify and streamline the application process for Oil Discharge Prevention and Countermeasure Plans (ODPCP). However, the Borough does have some concern over the modifications surrounding the apparent reduction in flexibility in ODPCP plan structure, information sources and how information is required to be displayed. With the breadth of the proposed changes, the Borough respectfully requests a substantial implementation period to allow plan holders adequate time to redesign and update their ODPCP's and related internal processes as needed.

After a review and analysis of the proposed regulatory changes, the Borough believes there will be a sizable economic impact should the proposed changes be adopted. While the Borough does agree that savings will be realized with repealing the need for publishing Public Notices in publications; those cost will be more than offset by the costs incurred by updating to new regulatory requirements.

If you have any questions, please contact me at (907) 852-0469, (Scott.Danner@north-slope.org), or Mr. Kevin Fisher, Borough Law Department, at 907- 852-0300 (Kevin.Fisher@north-slope.org).

Respectfully,



Scott K. Danner, Director
North Slope Borough, Public Works
PO Box 350
Utqiagvik, Alaska, 99723

cc: Joe Ramirez, NSB Public Works, Division Program Manager
Matt Dunn, NSB Public Works, Division Manager of Fuels and Natural Gas
Guy Wade, Jacobs Technology
Cynthia Trapp, Jacobs Technology

Attachment:

- North Slope Borough Draft 18 AAC 75 Part IV Comments