



KENAI

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January 19, 2022

Jason Brune, Commissioner
Department of Environmental Conservation
410 Willoughby Avenue, Suite 303
Juneau, AK 99801-1795

Re: Notice of Proposed Changes to Oil Prevention Requirements in ADEC Regulations

Dear Commissioner Brune,

The City of Kenai appreciates the opportunity to provide comments to the Alaska Department of Environmental Conservation (ADEC) regarding Proposed Changes to Oil Pollution Prevention Requirements in ADEC's Regulations. The City of Kenai, its residents and visitors depend on healthy ecosystems locally and statewide. ADEC, along with the Cook Inlet and Prince William Sound Advisory Councils and industry participants are responsible for a program that helps reduce the risk of potentially catastrophic oil spills and releases that threaten Cook Inlet and other waterbodies. The City of Kenai is supportive of the regional Citizens Advisory Councils and recognizes their imperative role in reducing this risk. While it is understood that many of the proposed regulatory changes are beneficial and have widespread support, the City of Kenai understands that there are some proposed changes that present ongoing concern. The City of Kenai requests ADEC reconsider or clarify the following proposed regulatory changes:

1. Reduction of Number of Oil Spill Drills and Exercises.

The City of Kenai recognizes the importance of oil spill drills and exercises and requests that the regulations maintain existing requirements.

2. Commitment to Examine Best Available Technologies.

Regulatory changes should not result in any diminished emphasis on the examination and use of best available technologies.

3. Notifications to Regional Citizen Advisory Councils.

Regional Citizen Advisory Councils should continue to be named within the regulations as recipients to be notified of plan reviews, updates, and amendments.

4. Changes in Ownership, Operator or Name Change to be Treated as Major Amendments.

Changes in ownership, operator or name changes should be treated as major amendments available for public review and comment ensuring the public has an opportunity to understand changes and implications for planning and safe and effective operations.

5. State and Federal Regulations.


The proposed regulations should be revised to require operators to follow all state and federal regulations that work hand in hand with ADEC's regulations for prevention, response, safety and environmental protection.

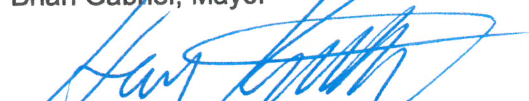
6. Prevention and Response Capabilities.

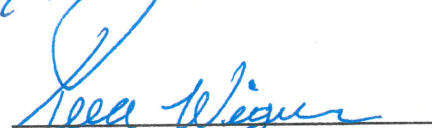
The proposed regulations should not diminish prevention or response capabilities and ensure status quo or better with regard to human and environmental safety.

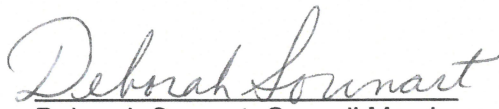
Thank you for your consideration.

Sincerely,

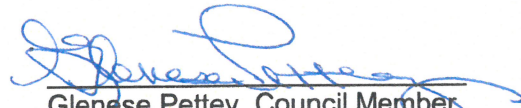

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