

# MEMORANDUM

# State of Alaska

Department of Environmental Conservation  
Office of the Commissioner

TO: Rachel Bylsma,  
Deputy Chief of Staff

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FROM: Randy Bates,  
Commissioner

SUBJECT: DEC 2026 Regulatory  
Reform Plan

## Executive Summary

This memo constitutes the Department of Environmental Conservation's (DEC or Department) Regulatory Reform Plan developed in response to Administrative Order 360 (AO 360) and in alignment with the Governor's directive to reduce unnecessary regulatory burden while maintaining essential environmental and public health protections.

In response to AO 360, DEC conducted a division-by-division review of its regulations to identify opportunities to repeal, consolidate, streamline, and modernize regulatory requirements. Collectively, the regulatory reforms proposed in this plan will result in meaningful reductions in regulatory burden, improved clarity and predictability for the regulated community, and a deliberate recalibration of discretionary authority to ensure DEC regulations do not exceed what state or federal statute requires.

Across divisions, DEC has prioritized reforms that:

- Reduce unnecessary approvals, delays, and compliance costs;
- Improve flexibility for homeowners, small businesses, and local governments;
- Maintain environmental and public health outcomes while reducing socio-economic impacts on Alaskans; and
- Reflect the Governor's directive to err on the side of humans where discretion exists.

DEC's baseline count establishes 13,000 discretionary regulations. This plan includes 40 proposed regulation packages (see Section 3a, Proposed Regulatory Reform). These represent a reduction of more than 2,600 requirements, or 20%, in the number of requirements alone. DEC's plan further specifies actions for reducing costs to Alaskans; simplifying, streamlining, and modernizing regulatory requirements that are appropriate to retain; and codifying guidance documents that belong in regulation and removing ones that are no longer applicable. Lastly, DEC anticipates additional reductions in 2026-2027 with continued review of regulations, permit processes, and guidance documents.

## **Section 1: Baseline Review**

### **Mission-Supportive & Burden-Reducing Discretionary Regulations Review**

DEC continues to conduct a comprehensive review of both Mission-Supportive (Category 2) and Burden-Reducing (Category 3) discretionary regulations (See DEC 2026 Regulatory Reform Plan Outline – Sec. 1 Baseline). While many of these regulations are essential for ensuring DEC's mission of protecting human health, safeguarding the environment, and supporting responsible development, they can be improved to enhance clarity, streamline processes, and reduce unnecessary burden for industry, communities, and DEC staff.

DEC's review identifies opportunities to modernize procedures, consolidate redundant requirements, clarify expectations, and provide optional compliance paths where feasible, while maintaining the regulatory safeguards critical to public health and environmental protection.

### **Regulatory Packages Addenda**

There may be additional regulatory packages DEC will put forward under AO358 as we continue working on three important fronts: integrating stakeholder input; reviewing permitting workflows; and streamlining guidance documents. This plan already achieves 20% reduction in 2026; however, DEC anticipates additional reforms based on continued review.

### **Guidance Document Reduction and Codification**

DEC maintains a total of 486 guidance documents totaling almost 5,000 pages, many of which contain technical or procedural requirements that are currently advisory but may be essential for consistency, safety, and regulatory clarity. The AO 360 process is evaluating these guidance documents to determine which elements can be codified into regulation to improve enforceability, reduce ambiguity, and streamline compliance. The Department has identified, and will continue to identify, additional guidance documents that are appropriate for removal.

Selected guidance documents are being directly incorporated into proposed regulatory packages to clarify requirements, reduce duplication, and improve usability for both regulated entities and DEC staff:

- **18 AAC 72 – Onsite Wastewater System Installation Manual (OWSIM):** Codifies leach field application rates, mound system requirements, and holding tank installation approvals. This ensures that critical standards previously available only in guidance are now enforceable and clearly applied in permitting.
- **18 AAC 75 – Oil Spill Response Exercise Manual:** Streamlines planning, execution, and evaluation requirements for ODPCP holders. Reduces duplication, clarifies expectations for exercises, and provides improved usability for plan holders and DEC staff.
- **18 AAC 70 – Toxics Manual:** Evaluation will focus on numeric criteria, calculation procedures, and other technical standards.

- **18 AAC 75 – SPAR Technical Guidance for Soil & Groundwater Cleanup:** Assessment includes cleanup levels, procedural guidance, and reporting requirements to determine which elements should be codified to standardize expectations and reduce redundant reporting.
- **18 AAC 78 – UST Procedures Manual:** Installation, monitoring, maintenance, and decommissioning procedures are being reviewed for potential inclusion in regulation to align with 18 AAC 75, eliminate outdated or redundant language, and simplify compliance.

A broader review of the remaining guidance documents is underway, with an anticipated completion timeline of Q2 2027, to identify additional codification opportunities, reductions, regulatory clarifications, and modernization improvements.

### **Summary**

This phased and structured approach ensures that mission-critical regulations are not only preserved but refined, enhancing operational efficiency, regulatory clarity, and burden relief. By systematically reviewing both mission-supportive and burden-reducing discretionary regulations, DEC is improving the regulatory framework while continuing to uphold public health, environmental protection, and responsible development objectives.

## **Section 2: Stakeholder Engagement**

DEC received over 300 comments and recommendations from our stakeholder engagement in 2025 (see Sec. 2c Commentor List; see Sec. 2a for a summary table of DEC's stakeholder outreach efforts).

### **Division of Administrative Services (DAS)**

DAS solicited stakeholder input related to 18 AAC 15 and 18 AAC 95 during a 30-day written comment period held September 17, 2025, through October 17, 2025, and a virtual hearing held on October 15, 2025. Input was solicited and received on topics including administrative procedures, appeals processes, regulatory reform frameworks, permit reform concepts, and interagency coordination. Input was received from a mix of public interest organizations, industry groups, and Alaska Native Tribes.

#### ***Major Themes Raised by Stakeholders***

- Appeals Process Clarity and Accessibility (18 AAC 15)
- Regulatory Reform Process and Public Engagement
- Automatic Approval Provisions
- Tribal Engagement and Consultation

#### ***Overall Conclusion for Administrative Programs***

DAS's stakeholder engagement informed a measured, legally grounded approach to administrative reform. In alignment with stakeholder input, DEC will preserve appeal rights, enforcement authority, and public participation. These decisions align with AO 360 and the Governor's directive by emphasizing human-centered efficiency without diminishing accountability or statutory protections.

### **Division of Air Quality**

From August 26, 2025, through September 26, 2025, DEC solicited public input on Alaska's air quality regulations to identify opportunities to clarify requirements, streamline permitting, reduce costs and administrative burdens, and improve transparency and interagency coordination, consistent with Governor Dunleavy's Administrative Order 360. The 31-day informal comment period included written submissions and a telephonic public hearing on September 24, 2025, with input received from industry, conservation groups, regional advisory councils, and individual Alaskans.

#### ***Major Themes Raised by Stakeholders***

- Administrative Burden, Improvements for MG3/MG9 Permits
- Marine Vessel Emissions: Opacity and BMPs
- Public Health and Regulatory Integrity, AO 360, Regulatory Alignment and Modernization
- PM2.5 and Nonattainment Areas

- Title V / Minor Permit Interface & Fast-Track Processes
- Transparency, Technical Files, and Appeals
- Minor Permit Fast-Track, Thresholds, and Oversight
- Valdez Marine Terminal Permit Oversight and Compliance
- Costs, Monitoring, and Health Protections
- Opposition to Automatic Permit Approvals and Staffing Considerations
- Public Comment Periods and Transparency
- Support for DEC Mission

### *Overall Conclusion for Air Programs*

The Division of Air received comments from industry stakeholders and environmental groups regarding 18 AAC 50 Stakeholders emphasized balancing regulatory efficiency with public health, environmental integrity, and federal compliance. DEC reviewed all comments and incorporated feedback where appropriate, with many suggestions informing future regulatory refinements to make Alaska's air quality rules clearer, more efficient, and easier to follow.

### **Division of Water**

The Division of Water solicited stakeholder input from September 10, 2025 through October 10, 2025, on permitting procedures, water quality standards, enforcement frameworks, and small-system regulations, including 18 AAC 70, 72, and 83. Further, a listening session was held October 1, 2025. Input was received from utilities, industry representatives, mining interests, municipal stakeholders, public interest organizations, and advisory councils, Tribal governments, environmental and watershed organizations, commercial fishing and conservation interests, municipalities, industrial permittees, and trade associations. Feedback addressed water quality standards, use designations, permitting efficiency, public process, enforcement transparency, and program capacity.

### *Major Themes Raised by Stakeholders*

- Permit Application and Review Burden (18 AAC 83)
- Transparency, Timelines, and Predictability
- Water Quality Standards and Stringency (18 AAC 70)
- Small Temporary Camps and Remote Operations (18 AAC 72)
- Enforcement Authority and Public Confidence
- Protection of Water Quality Standards and Designated Uses
- Regulatory Costs and Environmental Impact Consideration
- Automatic Permit Approvals and Timelines
- Transparency, Public Access, and Public Process
- Site-Specific Criteria, Variances, and Implementation Flexibility
- Tribal and Community Concerns

- Wood/Log Cribs
- Nitrate Analysis Requirements
- Slope Restrictions
- Design Flow Requirements
- Drain Rock Depth and Soil Application Rates
- Reviewer Requirements
- Soil Application Rates and Dual-Classified Soils
- Separation Distance Requirements (Private Wells / Advanced Systems)
- Pipe Types and Materials
- Mound-Type Drainfields and Pressure Distribution
- Filter Fabric Requirement
- Use of OWSIM and Regulatory Process
- Septic Installation and Reporting Requirements
- Plan Review Timelines and Electronic Systems (EDMS)
- Liability Concerns and Drainfield Modifications
- Differentiation of Wastewater Requirements
- Well Decommissioning
- Requests for In-person, Local Staff

### *Overall Conclusion for Water Programs*

DEC received extensive and substantive stakeholder input on water quality standards, wastewater permitting, and APDES administration. Stakeholders offered a range of perspectives, from calls for increased flexibility to strong opposition to regulatory reduction. After careful review, DEC determined that many recommendations either fall outside the scope of AO 360 or are constrained by state and federal law. Accordingly, DEC does not propose changes that would weaken water quality protections, reduce public participation, or implement automatic permit approvals.

Stakeholder engagement reinforced the Division of Water's approach to preserve robust environmental safeguards while improving implementation efficiency. Where federal law limits flexibility, DEC has been transparent about constraints and continues to pursue improvements through coordination, guidance, and process refinement. These decisions advance AO 360 objectives by targeting real-world administrative burden reduction without compromising water quality, public trust, or compliance with statutory and regulatory requirements.

### **Division of Environmental Health (EH)**

The Division of Environmental Health solicited input from September 17, 2025 through December 5, 2025, on drinking water regulations, sanitary survey requirements, and private water system oversight, specifically under 18 AAC 80. A public meeting was held on October 15, 2025, and in response to requests from stakeholders, the comment period was extended. Stakeholders included industry representatives, rural community organizations, assisted living providers, public health

boards, and tribal entities. Input was received primarily through written comments submitted during noticed engagement periods, as well as direct correspondence from affected communities.

### ***Major Themes Raised by Stakeholders***

- School Lighting Levels (18 AAC 30.340)
- Small Temporary Camps (18 AAC 31, 18 AAC 80)
- Tribal and Rural Operations (18 AAC 31, 60, 80)
- Raw Milk (18 AAC 32)
- M.ovi Testing (18 AAC 36.125, 36.135)
- Rural and Tribal Water Systems (18 AAC 60, 80)
- Drinking Water Regulations (18 AAC 80)
- Pesticides (18 AAC 90)
- General Environmental Health Regulations
- Private Water Systems / 18 AAC 72 & 18 AAC 80 Inconsistencies
- Residential Assisted Living Testing Schedules
- Sanitary Survey Requirements – Rural Systems
- Waivers, Addressing, and Formatting in 18 AAC 80
- Drain Connection and Well House Configurations
- Coliform Bacteria and Start-Up Sampling (18 AAC 80.405 & 80.410)
- Regulatory Subsection Errors (18 AAC 80.605 – 80.620)

### ***Overall Conclusion for EH Programs***

DEC carefully considered stakeholder feedback on 18 AAC 80, including concerns about private water system regulation, monitoring requirements, sanitary survey compliance, and clarity of standards. DEC will retain critical public health protections while clarifying regulatory language, correcting inconsistencies, and providing guidance to support rural and remote communities. Where possible, DEC will adopt measures to improve usability and compliance without compromising safety. Stakeholder input will help refine implementation and guidance, ensuring that the regulations remain protective, practical, and consistent with federal and state requirements.

### **Division of Spill Prevention and Response (SPAR)**

SPAR solicited input on regulatory revisions under 18 AAC 75, 78, and 79, including Chapter 75's Articles 1–4, financial responsibility, aboveground storage tanks and piping, secondary containment, and spill reporting. Written comment periods were open from September 8, 2025 through October 8, 2025 in addition to three public meetings for oral testimony. Stakeholders included industry representatives, pipeline operators, tank operators, regional citizen advisory councils, and individual technical experts.

### ***Major Themes Raised by Stakeholders***

- Economic and Cost Analysis
- Public Process, Transparency, and Fairness
- Phase-in and Alignment with Federal Requirements
- Technical Standards, Templates, and Streamlining
- Financial Responsibility and Liability
- Spill Reporting and Hazardous Substance Identification
- Plan Holder and Operational Control Definitions
- Application, Approval, and Amendment Timelines
- Scenarios and Response Planning Standards
- ODPCP Content, Security, and Standardization
- Avoiding Expanded Scope of Information
- Best Available Technology (BAT) Requirements
- Oil Spill Response Exercises (18 AAC 75.485)

#### ***Overall Conclusion for SPAR***

The Division of Spill Prevention and Response (SPAR) conducted extensive stakeholder outreach on regulatory revisions, and most notably under 18 AAC 75, including oil storage, secondary containment, spill reporting, financial responsibility, and related operational standards. Stakeholders provided detailed input on economic impacts, technical standards, regulatory clarity, public transparency, and operational feasibility.

DEC carefully reviewed all comments and incorporated them into decision-making for current and future regulatory packages. While some feedback informed immediate clarifications or system improvements (for example, maintaining telephonic spill reporting alongside the online portal) many recommendations are guiding the 2026 regulation packages and future initiatives.

## **Section 3a: Division-Specific Regulatory Reform**

### **Administrative Services**

The Division of Administrative Services (DAS) is actively collaborating with agency divisions to support the implementation of AOs 359 and 360. DAS is also modernizing procedural requirements governing public notice and administrative appeals. Feedback identified opportunities to streamline processes, clarify expectations, and improve transparency. Key actions include:

- **Clarifying timelines, roles, and responsibilities** for appeals and administrative procedures to make processes easier for applicants to navigate while improving consistency and efficiency for staff.
- **Eliminating outdated newspaper publication requirements**, reflecting modern communication practices and reducing unnecessary costs.
- **Improving transparency and predictability** in administrative decision-making, providing applicants with clearer expectations and reducing the likelihood of delays or disputes.

These reforms will reduce delays, increase trust in agency decision-making, and facilitate early resolution of conflicts, delivering tangible benefits without expanding regulatory authority. They are informed by stakeholder input and align with the Governor's directive to focus discretion on efficiency and practical outcomes while preserving essential procedural safeguards.

### **Air Quality**

Air Quality's regulatory reform initiatives advance AO 360 by reducing discretionary regulatory obligations while maintaining full compliance with the federal Clean Air Act and Alaska's primacy obligations. The Department engaged extensively with stakeholders, including industry representatives, local governments, and the public, through workshops, comment periods, and active working groups. Several reform efforts arose directly from stakeholder feedback to reduce unnecessary costs, duplicative reporting, and permit delays.

Key initiatives include:

- **Targeted repeals and modernization of outdated provisions** across multiple regulatory packages to eliminate obsolete or duplicative rules.
- **Permit reforms that improve flexibility for regulated sources**, including simplification of reporting requirements under the MG3 and MG9 general permits for small rock crushing and asphalt plant operators.
- **Streamlined public notice and monitoring obligations**, reducing duplicative reviews, clarifying permit conditions, and improving the predictability of compliance expectations.
- **Enhanced integration of digital tools and automation**, such as AirTools workflow modernization and pilot AI-enabled processes, to improve permit tracking, data accessibility, and efficiency.

These efforts will deliver measurable reductions in discretionary obligations, decrease administrative burden for both applicants and staff, and generate tangible cost avoidance for households and businesses, particularly in areas of high permitting activity.

By preserving environmental protections while addressing economic realities and operational efficiency, Air Quality's initiatives meet AO 360 expectations, achieve durable burden reduction, and reflect the Governor's directive to implement pragmatic, human-centered regulatory solutions that are informed by stakeholder input.

## **Environmental Health**

Environmental Health's regulatory reform initiatives advance AO 360 by eliminating obsolete, duplicative, or inactive programs and narrowing remaining regulations to the minimum required by statute. The Department engaged extensively with stakeholders, including public health operators, local governments, industry groups, and community organizations, to identify areas where modernization, clarification, and process improvements could reduce burden without compromising public health or environmental protection.

Key initiatives include:

- **Revisions and repeals of outdated or duplicative regulations**, removing unused processes and administrative requirements across multiple regulatory packages.
- **Streamlining internal workflows and permitting processes**, including improved tracking of solid waste, drinking water, and food safety permits, to reduce manual steps, repetitive data entry, and application review delays.
- **Pilot automation and digital enhancements**, such as AI-enabled reminders for payments and renewals, expanded use of video-assisted or virtual inspections in remote communities, and exploration of unified data management approaches to reduce reliance on siloed databases.
- **Clearer guidance and standardized procedures** to promote consistent interpretation of regulations, improve compliance predictability, and support efficient interactions with applicants and permittees.

These reforms will reduce confusion, improve compliance, and lower administrative burden for both regulated entities and Department staff. By preserving statutory protections while incorporating practical, human-centered improvements, Environmental Health's initiatives meet AO 360 expectations and reflect the Governor's directive to implement efficient, stakeholder-informed regulatory solutions that prioritize both public health and operational effectiveness.

## **SPAR**

SPAR's regulatory reform initiatives advance AO 360 by repealing, consolidating, and modernizing discretionary regulatory provisions that no longer provide commensurate public benefit. The Department actively engaged with industry, local governments, and other stakeholders to identify

inefficiencies, outdated processes, and approval delays, ensuring reforms reflect the operational realities of Alaska's unique environment.

Key initiatives include:

- **Targeted repeal and modernization of outdated or duplicative provisions**, streamlining processes while maintaining critical oversight for spill prevention and response.
- **Restructuring discretionary authorities** to reduce timelines, improve predictability, and lower compliance costs, while preserving the ability for staff to provide compliance relief where appropriate.
- **Enhanced clarity and consistency in permitting and response procedures**, supporting faster and more efficient interactions between the Department, permittees, and external partners.

Collectively, these reforms will reduce regulatory volume and administrative burden, improve operational efficiency, and reinforce SPAR's mission to protect public health, wildlife, and the environment. By prioritizing stakeholder-informed improvements and practical outcomes, SPAR's initiatives align with AO 360 and the Governor's directive to err on the side of humans where discretion exists, demonstrating a balanced approach to effective and responsive regulation.

## Water

Water's regulatory reform initiatives advance AO 360 by shifting the Department's approach from prescriptive requirements toward flexibility, clarity, and expanded compliance options for homeowners, permittees, and local governments. Stakeholder engagement, including municipalities, utilities, consulting engineers, and local communities, directly informed these reforms, ensuring that process improvements address practical challenges, particularly in remote and small-community contexts.

Key initiatives include:

- **Clarifying regulatory language and expectations**, reducing confusion and improving the predictability of permit decisions.
- **Streamlining plan review and approval processes**, including reductions in administrative steps for routine or low-risk applications.
- **Expanding allowable technologies and compliance approaches**, consistent with industry standards and tailored to Alaska's unique operational environments.
- **Preserving discretionary flexibility** to provide meaningful burden reduction while maintaining water quality protections and statutory compliance.

These reforms will reduce delays, lower costs, and improve operational efficiency for both the Department and regulated entities. By prioritizing stakeholder-informed, human-centered improvements, Water's initiatives meet AO 360 objectives and reflect the Governor's directive to implement pragmatic, flexible regulatory solutions where discretion exists.

## Department-Wide Summary

Collectively, DEC's division-level reform initiatives represent a comprehensive, stakeholder-informed approach to regulatory modernization that fulfills the objectives of AO 360 and the Governor's directive. These initiatives:

- **Identify and prioritize specific regulations for reform**, using input from industry, local governments, public health operators, and other stakeholders to ensure reforms are practical, targeted, and responsive to real-world needs.
- **Organize and consolidate regulatory requirements into cohesive, clearly defined reform projects**, streamlining the submission and review process with the Department of Law while maintaining transparency and accountability.
- **Establish clear timelines and process milestones** for preliminary review, internal approvals, and implementation, improving predictability and reducing delays for both staff and regulated entities.
- **Preserve and strategically recalibrate discretionary authority**, maintaining necessary flexibility to provide compliance relief and process efficiency without compromising statutory, environmental, or public health protections.
- **Demonstrate measurable burden reduction**, including elimination of duplicative requirements, simplification of processes, modernization of outdated provisions, and expanded use of digital tools to improve permitting, reporting, and communication.

These reforms collectively ensure that DEC regulations are efficient, practical, and human-centered, balancing the need for robust environmental and public health protections with the operational realities faced by Alaskans and regulated entities. By systematically reducing unnecessary discretionary burden, clarifying processes, and leveraging stakeholder expertise, DEC positions its programs for more predictable, transparent, and cost-effective regulatory outcomes while maintaining statutory compliance and supporting sustainable development across Alaska.

## **Section 3b: DEC-Specific Permitting Process Improvements**

The Department of Environmental Conservation (DEC) is implementing targeted permitting reforms that focus on how permits are processed, reviewed, and issued, in addition to regulatory revisions. These reforms are designed to reduce unnecessary burden on applicants and staff, improve timeliness and transparency, and increase predictability, while continuing to meet statutory, primacy, and public health obligations. Stakeholder engagement is a central component of these reforms, ensuring that DEC actions are informed by industry, local governments, and other affected parties.

### **Eliminating Unnecessary Steps and Duplicative Reviews**

DEC is conducting division-level permitting workflow reviews to identify discrete steps that can be eliminated or combined without compromising environmental outcomes. These reviews are informed by stakeholder input from industry groups, municipal partners, and public comments. Specific actions include:

- Consolidation of application requirements where the same information is currently submitted multiple times across programs (e.g., facility information, site location, ownership, and operational descriptions).
- Elimination of procedural requirements that no longer serve a decision-making function, such as redundant notices, outdated submittal formats, or internal routing steps that do not add substantive review value.
- Clarification of interagency roles in permits that involve multiple departments, reducing duplicative review and minimizing applicant confusion about which agency is responsible for specific determinations.
- Expanded use of standardized permit conditions and templates for routine permits to reduce drafting time, improve consistency, and limit negotiation over conditions that are already well-established.

### **Defined Timelines and Process Discipline**

DEC is strengthening permitting timelines through both regulatory amendments and internal process controls. Examples include:

- Establishing clearer regulatory timelines for permit completeness reviews and final decisions where discretion exists.
- Using tiered or expedited review pathways for low-risk, routine, or administratively complete applications.
- Improving internal milestone tracking so staff and managers can identify bottlenecks early and reallocate resources when needed.

- Reducing approval timeframes in specific programs (e.g., shortening review timelines for amendments, modifications, or administrative updates that do not materially change environmental impacts).

Where automatic approval is not legally permissible or practicable, DEC is focused on creating predictable and enforceable internal deadlines to prevent unnecessary delays.

### **Transparency and Applicant Visibility**

DEC is taking concrete steps to improve transparency and applicant awareness of permit status and expectations, guided by stakeholder priorities for accessible and understandable information:

- Expanding electronic application and tracking systems to allow applicants to view submission status, review stages, and outstanding information requests.
- Standardizing completeness determinations and deficiency notices so applicants receive clear, consistent guidance on what is required to move forward.
- Improving written explanations of permitting decisions, including the rationale for conditions imposed, to reduce confusion and appeals.
- Providing clearer public-facing guidance documents and checklists that align with actual permitting practice.

### **Consistency and Predictability in Decision-Making**

To promote consistent outcomes, DEC is reinforcing uniform application of regulatory standards through ongoing stakeholder consultation:

- Updated guidance and internal training to ensure consistent interpretation of regulations across regions and programs.
- Use of standardized permit language and decision criteria for similar activities.
- Clarification of ambiguous regulatory provisions that currently result in varied interpretation or inconsistent permit conditions.

These efforts reduce uncertainty for applicants and limit discretionary variation that can lead to delays or disputes.

### **Technology and Process Modernization**

DEC is leveraging technology to modernize permitting operations, including:

- Expanded use of electronic submissions and digital records, reducing paper handling and manual processing. Stakeholder input reflects digitization is an ongoing process for the regulated community, and DEC aims to continue modernizing while identifying potential improvements from feedback.
- Automation of administrative steps such as completeness checks, fee calculations, and routine notifications where feasible.

- Improved data management and reporting tools to support workload tracking, performance measurement, and public access to permitting information.

## **Division-Specific Permitting Improvements**

These targeted division-specific permitting improvements demonstrate DEC's commitment to implementing the Governor's regulatory reform directives. Stakeholder engagement will continue to be incorporated at each stage. Each division's efforts are aligned with AO 360 and collectively position the Department to modernize permitting operations in a deliberate, phased, and resource-conscious manner.

### ***Division of Administrative Services***

The Division of Administrative Services (DAS) is actively collaborating with agency divisions to support the implementation of AOs 359 and 360. Through the Office of the Commissioner, DAS leads and coordinates cross-divisional efforts while supporting the development and implementation of database and portal enhancements for permitted activities, improving operational efficiency for both staff and customers.

Consistent with AO 359 requirements and the intent of AO 360, DAS is conducting a comprehensive review of internal financial practices and administrative processes to ensure documentation accuracy and eliminate unnecessary or duplicative efforts. By reducing internal administrative burden, DAS helps divisions remain focused on permitting reform, process modernization, and operational efficiency initiatives.

### ***Air Quality***

The Division of Air Quality is actively working with industry to identify opportunities to reduce administrative burden and streamline operating requirements, particularly for small rock crushing and asphalt plant operators covered under the MG3 and MG9 general permits. These improvements were initiated in response to stakeholder feedback during the AO 360 public comment period and are being advanced through an active industry working group. Specific initiatives include:

- Simplifying reporting requirements and evaluating opportunities to reduce permit administration and emission-related fees while maintaining environmental protections.
- Deploying a novel AI Agent within Microsoft CoPilot that works with SQL database data to support internal staff review and analysis, pending GCC Client updates.

Additional future opportunities may include AI-enabled application review, enhanced automation, and improved interagency integration, with priorities balanced against feasibility and resource constraints.

## *Environmental Health (EH)*

EH is focusing on reducing manual processes, increasing continuity, and exploring ways to modernize its database infrastructure to improve permitting efficiency:

- **Workflow Mapping and Automation:** Analyzing internal workflows across programs, including Solid Waste, Food Safety & Sanitation, and Drinking Water, to identify steps that can be automated or consolidated.
- **Database Modernization Planning:** Aging, siloed systems such as SWIMS, SDWIS, and EST are being assessed for opportunities to integrate or modernize. While a full new database is not currently feasible due to nationwide funding constraints, the Division is exploring scalable solutions that would allow for centralized plan tracking, status updates, and improved internal coordination.
- **Electronic Plan Submissions and Payment Integration:** Piloting digital workflows for plan review submissions and exploring integration with online payment systems to reduce staff workload and improve applicant visibility.
- **Virtual and AI-Enhanced Inspections:** Expanded use of video-assisted remote inspections and predictive compliance tools, including machine learning models to identify high-risk facilities, particularly for remote communities.
- **Transparency and Consistency:** Standardizing completeness determinations, deficiency notices, and guidance materials to improve clarity for applicants and ensure consistent application of regulatory standards across all programs.

These measures are intended to streamline permitting operations, reduce burden for applicants and staff, and lay the groundwork for future workflow and database enhancements, all while maintaining regulatory compliance and protecting public health and environmental quality.

## *Water*

The Division of Water is advancing a comprehensive modernization effort to improve permitting efficiency, regulatory clarity, and compliance outcomes. Key initiatives include:

- **Streamlined Permitting and Approvals:** The division is refining its permitting, plan approval, and authorization processes to enhance predictability, shorten issuance timelines, and ensure a more accessible regulatory framework.
- **Expansion of Digital Services via EDMS:** Leveraging the Environmental Data Management System (EDMS) and MyAlaska authentication, the division now offers a unified digital platform for permit applications, signatures, payments, and, in many cases, same day permit issuance. Ongoing development aims to make EDMS a true single source permitting portal, including future integration of mandatory electronic reporting. Legacy records are being digitized to improve public access.

- **Regulatory Updates for Clarity and Efficiency:** The division is revising regulations to simplify permitting and water quality standards. Proposed changes include clarifying mixing zone provisions in anadromous waters, consolidating toxic substance standards into a single regulation, and expanding options for septic system installation and approval to reduce costs and processing times.
- **Enhanced Compliance Assistance Approach:** The division has adopted an assistance first compliance strategy, reflected in an updated Enforcement Response Guide and the use of informal actions in 99% of cases. EDMS now supports proactive compliance through automated reminders and follow-up notifications.

These improvements are intended to standardize permitting processes, reduce staff burden, and provide applicants with predictable timelines and transparent status updates.

## **Proposal Submission Conclusion**

The Department of Environmental Conservation's regulatory reform efforts reflect a disciplined, transparent, and human-centered approach to implementing Administrative Order 360 and the Governor's directive. Rather than pursuing reduction for its own sake, DEC has undertaken a comprehensive evaluation of its regulatory framework to ensure that each requirement serves a clear statutory purpose or delivers tangible public benefit.

Across all divisions, the Department has prioritized reforms that were directly informed by stakeholder and industry input, focusing on eliminating obsolete or duplicative requirements, consolidating complex regulatory structures, modernizing outdated provisions, and improving permitting efficiency and predictability. Where discretionary authority exists, DEC has intentionally recalibrated its use to reduce unnecessary burden, shorten timelines, and improve compliance outcomes while preserving the essential tools needed to protect public health, the environment, and Alaska's natural resources.

DEC has also committed to sustained regulatory discipline beyond the initial review period. The Department will continue its baseline discretionary review, guidance document incorporation, advance additional regulatory reform packages through 2026 and 2027, and integrate permitting process improvements that emphasize transparency, accountability, and timely decision-making. This includes targeted use of technology, standardized processes, and clear timelines to better serve Alaskans and regulated entities alike.

Collectively, these actions demonstrate DEC's commitment to responsible stewardship, regulatory restraint, and continuous improvement. The Department's reforms align with the Governor's expectation to err on the side of humans where discretion exists, support economic activity and community needs, and ensure that Alaska's regulatory system remains effective, defensible, and responsive. DEC stands ready to continue working with the Governor's Office, the Department of Law, stakeholders, and the public to deliver durable, meaningful regulatory reform that benefits all Alaskans.