

# Margo Reveil

Attention: Kimberly Stryker  
Alaska Department of Environmental Conservation  
555 Cordova Street, Anchorage, AK 99501

Dear Alaska Department of Environmental Conservation,

I am writing this letter to ask that you reconsider and take no action on the proposed regulation changes to Title 18 Chapter 34 of the Alaska Administrative Code, Seafood Processing and Inspections. The proposed fee increases are for laboratory analysis and testing for paralytic shellfish poisoning (PSP) toxin and shellfish growing water.

- 18 AAC 34.905: Increase paralytic shellfish poisoning (PSP) analysis and testing fees
- 18 AAC 34.905: Increase microbiology analysis and testing fees for presumptive coliform, confirmed coliform, and Escherichia coli (non 0157:H7) and (0157:H7).

With a vision established by the Mariculture Task Force to "develop a viable and sustainable mariculture industry producing shellfish and aquatic plants for the long-term benefit of Alaska's economy, environment, and communities." State and federal governments have invested millions of dollars to grow the mariculture industry in Alaska.

Small farms and local businesses will be hurt the most by this fee increase. Many people invest their own capital into building and establishing a Mariculture farm while supporting the rural local economy with their production of oysters. This fee increase will take away from profits needed to maintain operations of an oyster farm leading ultimately to closure.

The intended increase in fees for paralytic shellfish poisoning (PSP) toxin testing and analysis from \$125 to \$312 would be a death knoll to Alaska's Shellfish industry.

Safe consumption of shellfish is the number one priority to commercial shellfish growers and we need lab testing to be affordable (with farms in remote locations paying up to \$100 in shipping fees per test sample through airlines). As ocean chemistry changes and harmful algal bloom trends south of us move into our waters, there should be zero disincentive to growers for testing, if and as they see indications that there may be blooms occurring near their growing areas. Since there is no non-commercial testing in Alaska, commercial farms are the only bellweather for their local communities as to the health of shellfish near population centers with farms. Additionally, growers in Alaska are already at a competitive disadvantage to farms south of us due to transportation costs, if our testing fees exceed what growers in others states pay, our business models collapse.

Rather than increasing fees, Alaska should be looking very hard at getting costs aligned with states like Maine where public/private partnerships have reduced fees to their farms to \$50/test. As food security becomes an increasing concern to Alaskans, the State Authority should be looking for ways to test more, and open up the mass of wild shellfish rich throughout Alaska's extensive coastline for subsistence and recreational harvesting as well. While the entire coast of Alaska may seem too large to monitor, small sections close to coastal communities could be tested and opened up, broadening the base of Alaskans that could benefit from a healthy Environmental Health Lab toxin testing program.

We are strong supporters of our Lab, but Alaska needs to do more to make it relevant to a broader base, and bring the cost in line with other state labs, before considering increasing fees.

Thank you,  
Margo Reveil, Owner  
Jakolof Bay Oyster Co. LLC