

Clayton Spitler

See attached PDF file containing comments.

- As others have commented, it is important not to rush the process of revising 18AAC72. Based on review of the draft proposed revisions, and industry stakeholder comments submitted thus far, it is apparent that more time (and more input from stakeholders) will be necessary in order to generate well thought-out, reasonable, regulations which are protective of public health and the environment while being minimally burdensome to all stakeholders in the wastewater industry, and Alaskans in general. The additional time spent now will be worth it many times over, as the potential unnecessary effort and cost associated with poorly written regulations will negatively affect all parties (including ADEC) later if we don't fix the issues now.
- All stakeholders bring a valuable viewpoint to the table, and we need to work together to generate a good result. ADEC should form a technical review committee (TRC) comprised of interested industry stakeholders (perhaps it has been created but it needs to be formalized), and an iterative approach to revising 18 AAC72 should be implemented, perhaps as follows. It's unknown at this time how many iterations will be necessary, but again, a good product will take time.
 1. ADEC publishes draft #1 revisions (already performed)
 2. TRC submits comments on draft #1 revisions (in process)
 3. ADEC publishes draft #2 revisions, revised per TRC comments
 4. TRC submits comments on draft #2 revisions
 5. ADEC publishes draft #3 revisions, revised per TRC comments
- As others have commented, the Municipality of Anchorage (MoA) has an existing wastewater code which was extensively researched, refined, and generated by a TRC. In the interest of being efficient with revising 18AAC72, ADEC (and the TRC which should be formed for the current revision) may want to consider incorporating sections of the MoA code as/where applicable.
- I agree with most, if not all, of the comments submitted by professional engineers thus far. However, I do not see re-typing them here as necessary, especially in light of my previous comments on this sheet and the need for a TRC.

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