



Douglas Island Pink and Chum, Inc.

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January 26, 2023

**Ms. Anne Weaver
Alaska Department of Environmental Conservation
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501**

Re: 2022 Draft General Permit AKG130000 Alaska Pollutant Discharge Elimination System

Dear Ms. Weaver and ADEC permitting staff:

Douglas Island Pink & Chum, Inc. (DIPAC) wish to reaffirm our appreciation, as expressed in the January 17, 2023 joint letter by the Alaskan Hatchery Operators, of the revisions made to the draft permit AKG 130000. We feel that these changes to the October draft maintain ADEC's oversight in ensuring environmental standards are maintained while at the same time reducing some of the financial burden endured by the hatchery operators. The DIPAC organization much appreciates the reduction of sampling frequency from that required with the 2018 through 2022 General permit.

Although the sampling frequency and associated costs have been, in many instances reduced, the addition of a requirement to fill out and submit monthly Discharge Monitoring Reports (DMRs) somewhat offsets this time and cost saving. It is unclear as to why ADEC desires monthly reporting of the same information that has been, and will continue to be provided in the APDES Annual Reports for each hatchery facility. This requirement is seemingly superfluous will result in further time commitment by our staff. With the requirement of prompt reporting of incidents of non-compliance already in-place, we request clarification as to how this increased frequency of reporting will aid ADEC in ensuring compliance by the hatchery operators. How will this additional administrative layer help to protect the waters of the State of Alaska?

DIPAC also strongly encourages ADEC to adopt the EPA exemption from regulation on discharges from net pens rearing native species for a period of 4 months or less in the final permit. We would reiterate the comments from all of the hatchery operators that the annual seafloor surveys required for Zones of Deposits (ZOD) is cost prohibitive, and that the availability of qualified divers and/or operators of a remote operated vehicle (ROV) capable of conducting such extensive surveys is virtually non-existent. We would also point out that, although ADEC is to be commended for utilizing hatchery operator provided data in modifying sampling requirements for outfalls, requirements for mixing zones or ZOD for netpen operations in the draft permit indicate a shortcoming in the use of valuable historical information. We would invite ADEC to view photos and/or video footage of the bottom surveys conducted at our netpen sites with our ROV over the past 5 years. Upon inspection of the MSH facility in 2020, a portion of this footage was viewed by the inspectors and the offer was made at that time to provide them with the entire

collection of this documentation. The inspectors declined this offer and the permitting section has neither viewed nor requested to be provided with these photos and video footage which could be highly valuable in drafting language in the new permit regarding sampling and compliance at the netpen sites.

As with all of Alaska's hatchery organizations, DIPAC exists to support sustainable fishing opportunities for all users of the resource. The presence of unclean water or unsafe water conditions would be contrary to our mission of incubating, rearing, and releasing healthy salmon, thereby optimizing the returning adults each year. With this in-mind, we feel strongly that we are good stewards of the salmon resource that we produce and the ecosystem that these fish rely upon. We very much support the intended objectives of the federal Clean Water Act and its application in the Alaska general permit, but feel that the magnitude and scope of the draft permit AKG 130000 is still more demanding than is necessary to regulate perceived pollutants from DIPAC or other Alaskan hatchery operations and facilities.

Thank you again for the opportunity to comment on this draft permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Harms". The signature is fluid and cursive, with a long horizontal stroke at the end.

Katie Harms
Executive Director – Douglas Island Pink & Chum, Inc.

A handwritten signature in black ink, appearing to read "Brock Meredith". The signature is cursive and somewhat stylized, with a prominent loop at the end.

Brock Meredith
Operations Manager – Douglas Island Pink & Chum, Inc.