



February 23, 2022

Office of the Governor
PO Box 110001
Juneau, AK 99811-0001

Honorable Governor Dunleavy,

The Petersburg Borough continues to take part in discussions with the ADEC and EPA regarding wastewater discharge permit renewals. Petersburg, as well as eight other Alaskan communities, has maintained a Clean Water Act secondary treatment waiver, known as a 301h waiver, through the EPA since 1988.

As part of the renewal process, ADEC will be requiring 301h waived treatment plants to meet State water quality standards. These were tempered in the past via mixing zones that allowed for adequate dilution of wastewater and adherence to water quality standards at the edge of the mixing zones. Current permit renewal efforts with EPA have been impacted by an EPA third-party study that concluded existing mixing zones are inadequate to meet Alaska's water quality standards. As a result of these increased standards, Petersburg will be required to add treatment in the form of disinfection of our effluent to reduce fecal coliform concentrations at our discharge point. The Petersburg Borough strongly disagrees with the conclusion to reduce the size of our existing mixing zone and to mandate disinfection of our discharge.

The costs to implement disinfection will cause a major shift in the operation and funding of Petersburg's wastewater utility. The impacts to our rate payers will be substantial as there are many other projects that must be undertaken by the utility to maintain our collection system and continue to provide service to our customers. The Municipal Loan program at ADEC has been a large benefit to Petersburg in the past, but if additional treatment requirements are forced upon us we ask that consideration be given to establishing a grant program to fund additional treatment infrastructure and operational expenses related to ADEC's water quality certification and the resulting discharge permit requirement for disinfection. To place this burden on our ratepayers, in addition to other planned debt in support of infrastructure maintenance, is tenuous at best and we would appreciate some monetary relief from the State of Alaska as we seek to meet the water quality standards set by your agency.

Thank you for your consideration.

Respectfully,

Mark Jensen
Mayor

cc: Senator Bert Stedman
Representative Jonathan Kreiss-Tomkins
Randy Ruaro
Ray Matiashowski