



**Admiralty**  
ENVIRONMENTAL

641 W. Willoughby Ave., Suite 301 Juneau, AK 99801 (907) 463-4415 (480) 247-4476 (f)

Alaska State Representatives Feige and Saddler  
Co-Chairs, House Resources Committee

January 23, 2013

Comments on House Bill 80 - "An Act relating to the regulation of wastewater discharge from commercial passenger vessels in state waters; and providing for an effective date."

Thank you for the opportunity to provide comments concerning HB 80 - "An Act relating to the regulation of wastewater discharge from commercial passenger vessels in state waters; and providing for an effective date." I am the owner and operator of Admiralty Environmental, an independent consulting firm that performs a large portion of the project management and wastewater sampling activities to monitor large cruise ships in Alaska waters, and I have direct experience with all of the individual vessels that operate under the ADEC General Permit and will be affected by the proposed changes that would result from this legislation. I have been involved with the cruise ship program since the original Alaska Cruise Ship Initiative in 1999, and have performed a large portion of the sampling of these ships from the inception of the program to the present time. My experience with this program and familiarity with the Alaska cruise fleet gives me a unique perspective in both the history of the cruise ship program in Alaska and the state of the current advanced wastewater treatment systems being utilized on vessels.

The cruise industry has placed a significant effort into applying new technology to upgrade ship treatment systems and comply with new regulations from both the USCG and the State of Alaska, and I have witnessed these changes over the past 12 years. The positive results of this technology are well documented by the vast improvement in sample results, and my interactions with the industry lead me to believe that the vessel owners are genuinely committed to meeting their regulatory requirements and protecting the environment. Based on my observations, I strongly agree with the conclusions of the ADEC appointed independent Science Panel that: the advanced wastewater treatment systems on cruise ships in Alaska are the most technologically advanced and effective systems available; aquatic organisms are currently protected through the ADEC general permit; there are no proven systems that can meet the standards set by the ballot initiative; and there is little environmental benefit to be gained by lowering the current permitted effluent limits to the standards of the 2006 initiative. The State of Alaska has the opportunity to solidify this program through the issuance of a new general wastewater permit that establishes reasonable and consistent effluent limits. I believe that the passage of HB 80 will allow ADEC to write a permit that accomplishes this. I encourage you to pass this legislation, which will maintain water quality in the State while encouraging large cruise vessels to continue to invest in and use their proven advanced wastewater technology.

Kindest Regards,

David Wetzel  
President, Admiralty Environmental