

Jerrel Howard and WDFW reply to Ecology Comment on DNS 25-008

The referenced September 1, 2022, letter is available upon request

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**From:** Jerrel Howard <[jerdebhoward@gmail.com](mailto:jerdebhoward@gmail.com)>  
**Sent:** Tuesday, March 18, 2025 12:04 PM  
**To:** Bauer, Jordan (ECY) <[jbau461@ECY.WA.GOV](mailto:jbau461@ECY.WA.GOV)>  
**Cc:** Osborne, Randall S (DFW) <[Randall.Osborne@dfw.wa.gov](mailto:Randall.Osborne@dfw.wa.gov)>; Niewolny, Laurie (ECY) <[lnie461@ECY.WA.GOV](mailto:lnie461@ECY.WA.GOV)>  
**Subject:** Re: Deep Creek Fish Farm

External Email

Jerrel Howard  
Silver and Gold Fish Farm

As noted in your September 1 2022 letter-- the solids management infrastructure is still in place in the form of settling pond. The number of grass carp requested will not add more than a minimal weight to the project's production of the Farm. This is an attempt to manage vegetation of the ponds using ecological friendly biological solutions that should have no effect on the Deep Creek environment. Our goal is to never use any chemical solution which would effect Deep Creek

Thank you

Jerry

On Tue, Mar 11, 2025, 3:44 PM Bauer, Jordan (ECY) <[jbau461@ecy.wa.gov](mailto:jbau461@ecy.wa.gov)> wrote:

Hi Randy,

Correct, my comment and the letter from 2022 are directly related. The Deep Creek Fish Farm does not require an Upland Finfish Hatching and Rearing Permit for those activities in 2022 or the current proposed activities but general requirements and discharge to Deep Creek must still meet the effluent limits for any upland finfish facility regardless if they have a Permit or not. WAC 173-221A-100 and specifically subsections (4) and (5) relate to what I'm referring to including any future inspections conducted by Ecology ensuring limits and operations follow those subsections. As long as Jerrel follows those subsections in the future he shouldn't have a problem. In terms of a formal acknowledgement I'd say he would just need to confirm he would

conduct operations for the proposed stocking of carp according to WAC 173-221A-100.

Hopefully that makes sense but if not let me know or if I'm unavailable please contact Laurie Niewolny.

Thank you,  
Jordan

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**From:** Osborne, Randall S (DFW) <[Randall.Osborne@dfw.wa.gov](mailto:Randall.Osborne@dfw.wa.gov)>  
**Sent:** Tuesday, March 11, 2025 11:00 AM  
**To:** Bauer, Jordan (ECY) <[jbau461@ECY.WA.GOV](mailto:jbau461@ECY.WA.GOV)>  
**Cc:** [jerdebhoward@gmail.com](mailto:jerdebhoward@gmail.com) <[jerdebhoward@gmail.com](mailto:jerdebhoward@gmail.com)>  
**Subject:** FW: Deep Creek Fish Farm

Hi Jordan,

I had an in-person conversation with Jerrel Howard regarding your comment (attached) that was submitted during the SEPA process for his fish farm/grass carp (Silver and Gold) located near Deep Creek in Spokane County. Mr. Howard informed me that Ecology visited his farm in 2022 to check for water quality compliance, which resulted in a letter (dated September 1, 2022) stating that his farm was in compliance (also attached).

Mr. Howard was inquiring whether this letter could act as a formal response to your comment due to the relatively recent compliance review of his farm.

I have cc'd Mr. Howard on this email, and we look forward to your response.

Thanks Jordan,

Randy Osborne  
District 2 Fish Biologist  
Washington Department of Fish and Wildlife  
[2315 N. Discovery Place](#)  
[Spokane Valley, WA 99216](#)  
(509) 892-1001 ext. 302

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**From:** Jerrel Howard <[jerdebhoward@gmail.com](mailto:jerdebhoward@gmail.com)>  
**Sent:** Tuesday, March 11, 2025 9:08 AM  
**To:** Osborne, Randall S (DFW) <[Randall.Osborne@dfw.wa.gov](mailto:Randall.Osborne@dfw.wa.gov)>  
**Subject:** Fwd: Deep Creek Fish Farm

External Email

----- Forwarded message -----

**From:** **Bauer, Jordan (ECY)** <[jbau461@ecy.wa.gov](mailto:jbau461@ecy.wa.gov)>  
**Date:** Thu, Sep 1, 2022, 7:56 AM  
**Subject:** Deep Creek Fish Farm  
**To:** [jerdeb.howard@gmail.com](mailto:jerdeb.howard@gmail.com) <[jerdeb.howard@gmail.com](mailto:jerdeb.howard@gmail.com)>  
**Cc:** Atkins, Chad (ECY) <[CATK461@ecy.wa.gov](mailto:CATK461@ecy.wa.gov)>

Hi Jerrell,

Please find the attached compliance letter for your fish farm explaining Ecology's position in regards to how your project operations will not require a wastewater discharge permit and meet WA state water quality standards for Deep Creek at this time. If you have any questions please feel free to contact me.

Thanks,

**Jordan Bauer**  
Finfish General Permit Facility Manager  
Washington Department of Ecology – Eastern Region  
Water Quality Program  
(509)-688-9403