



COOK • INLET • KEEPER

Protecting Alaska's Cook Inlet watershed and the life it sustains

VIA EMAIL ONLY

December 19, 2005

Nancy Sonafrank
Division of Water - Section Manager
Department of Environmental Conservation
610 University Drive
Fairbanks, Alaska 99709

Dear Ms. Sonafrank:

I would like to express my deep concern over the proposed amendments to the mixing zone provisions of the state's Water Quality Standards regulations codified in 18 AAC 70. As a stream ecologist monitoring the water quality and habitat trends of salmon streams on the Kenai Peninsula, I know firsthand that the future of our salmon resources and fishery-based economies depend on Alaskans finding ways to reduce stress to salmon habitat - NOT increase stress as these amendments will do.

Cook Inlet Keeper has been involved in monitoring salmon streams since 1998 with a DEC- and EPA-approved Quality Assurance Project Plan. Through this work, we have documented increasing water temperatures since 2002. We see exceedances for egg and fry incubation (13°C), fish migration routes (15°C) and temperatures above 20°C which by State Standards "may not be exceeded." For instance, on the Anchor River in 2005, water temperatures exceeded 13°C on 88 days, 15°C on 65 days and 20°C on six days with a high of 21.1°C. We know about these exceedances because of long-term monitoring efforts. Most of the streams, rivers, and lakes in Alaska have no such monitoring information, but there is every reason to believe that the warming trends seen on the Kenai Peninsula are equally dramatic across the State.

Reports about melting glaciers, permafrost, and sea ice; endangered polar bears; high air temperatures and forest fires are heard regularly and they all are sending the same message: things are changing. In addition to warmer temperatures, climate change is likely to alter coastal watersheds by affecting flooding frequencies, precipitation levels, surface and ground water volumes, soil nutrient dynamics, and distribution of wetlands. All these changes pose threats to our anadromous streams. The best defense we can arm our salmon populations with during this time of great change are intact watersheds with little habitat degradation. The least productive step we as a state can take is to weaken our water quality standards.

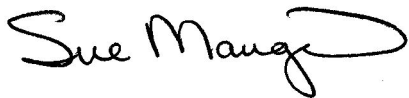
The lack of existing baseline data for Alaska's freshwater systems will create a great challenge to ADEC as it intends to base its decision on whether or not to allow a permit on available evidence provided by the applicant and "other credible sources." Available evidence is unlikely to be the

Mixing Zone Comments II
December 19, 2005
Page 2

comprehensive baseline studies that are really needed to understand water quality, water quantity, sediment, macroinvertebrate and fish population dynamics. With temperature and hydrologic changes ongoing, current data must be collected over a time period that will capture the variation that will influence a system's ability to dilute the pollution. This will require more than a year or two of data. Will available evidence be required to have been collected under a Quality Assurance Project Plan? If not, how will sources be deemed credible? With the burden of proof on the applicant, DEC clearly has no intention of conducting baseline studies itself. The current administration has shown no commitment to provide DEC with the resources necessary to ensure consistent monitoring and enforcement.

I feel strongly that the Alaska Department of Environmental Conservation's proposed amendments to the mixing zone provisions will compromise the long-term health and sustainability of its salmon resources. I appreciate the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Sue Mauger". The signature is written in a cursive, flowing style.

Sue Mauger
Stream Ecologist

CC: (VIA EMAIL ONLY)
Kurt Fredriksson, Commissioner, Alaska Dept. of Environmental Conservation
McKie Campbell, Commissioner, Alaska Department of Fish & Game
Governor Frank Murkowski