



**Kenai
Area
Fisherman's
Coalition**

PROTECTING YOUR FISHING RIGHTS & RESOURCES

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Draft 2012 Integrated Report Comments

The Kenai Area Fisherman's Coalition (KAFC) is an organization composed of scientists and concerned users of the Kenai Peninsula waters. We have fisheries biologists in our organization that provides over 120 years of experience on the Kenai and Upper Cook Inlet (UCI) in both research and management. We also like to consider ourselves a "Joe Fisherman" organization since we have no commercial interest.

We believe that habitat protection should be the primary goal of any resource organization or government agency. We support the concept that user group needs are secondary to habitat protection.

The KAFC has reviewed the Department of Environmental Conservation (DEC) 2012 Draft Integrated Report on the status of Alaskan water quality. While we appreciate this effort by DEC we have identified two river systems that have been omitted and we believe these should be included in the report. These are the Kenai River for turbidity and the Little Susitna River for hydrocarbons and turbidity.

We have reviewed the peer-reviewed reports by the Kenai Watershed Forum and the Aquatic Restoration and Research Institute on the levels of turbidity and hydrocarbons in these systems. We strongly maintain that these reports show impairment and meet the criteria for violation of the Alaska water quality standards for drinking water, recreation, and fish and wildlife protection. Therefore, these systems should be listed for Category 5 impairment.

We are concerned that DEC failed to list these systems because of the political influence and impact on user groups. As a sport fishing organization that puts users needs second, we would be a primary user, therefore we strongly support these listings so that solutions can be found and pollution reduced. Otherwise, we will continue to incrementally lose resources and have no one to blame but ourselves. The citizens of Alaska and the Nation deserve better than this.

Thank you for the opportunity to offer our comments on this report. We look forward to working with you on biological and scientific issues to resolve these pollution sources in these important rivers.

Respectfully Submitted,

Dwight Kramer
KAFC Chairman