



January 31, 2005

Mr. Alan Klimek, Director
Division of Water Quality
North Carolina Department of Environment and Natural Resources
1617 Mail Service Center
Raleigh, NC 27699-1617

Re: Water Quality Classifications in North Carolina

Dear Mr. Klimek:

The Environmental Concerns Committee (ECC) of the North Carolina Chapter of the American Fisheries Society (NCAFS) is concerned about an important issue that we believe should be addressed by the North Carolina Department of Environment and Natural Resources, Division of Water Quality. This issue involves classifying and reclassifying state waters to the highest and most appropriate level to adequately protect the aquatic resources of our state.

The mission of the NCAFS Chapter, Environmental Concerns Committee is to promote the conservation and responsible management of aquatic species and their habitats, to identify actions that may harm or benefit aquatic resources, to consider advocacy positions when deemed necessary, and to provide a forum for the exchange of ideas, information, and concerns through committee meetings, the NCAFS newsletter, and written correspondence. The NCAFS is a 139-member society of scientists representing state and federal regulatory and resource management agencies, academic institutions, and private organizations. Most NCAFS members are also members of the American Fisheries Society (AFS). The AFS was founded in 1870 and is the oldest and largest professional society representing fisheries scientists. The AFS promotes scientific research and enlightened management of aquatic resources for optimum use and enjoyment of the public.

As President of the NCAFS, I urge you and the staff of the North Carolina Division of Water Quality to:

1. reclassify streams or segments of streams to the highest and most appropriate water quality classification or supplementary classification when existing fish or benthic macroinvertebrate data or the presence of unique aquatic communities support it. For example, reclassifying a segment of - upper Dan River and its tributaries in Stokes County from Class C, Tr to High Quality Waters or to Outstanding Resource Waters is appropriate because of the unique and endemic fish fauna inhabiting those waters;
2. allocate resources to complete field studies in a timely manner after reclassification requests have been submitted to the Classifications and Standards Unit by a concerned citizen, resource agency, or other group; and
3. release study results and hold public meetings for reclassifications in a timely manner.

The attainment of the highest classifications of our waters and implementation of appropriate levels of resource protection afforded by those classifications is critical to the sustainability of aquatic habitats in our state. This has been identified by the North Carolina Wildlife Resources Commission as the first

resource goal for aquatic habitats in their *Fisheries and Wildlife Management Plan for the Yadkin-Pee Dee River Basin* (2004 draft). It was also listed as a priority goal in the final plan for the Catawba River Basin (July 2004).

The NCAFS, with its diverse and knowledgeable membership, can aid the Division of Water Quality in identifying waters that need reclassification and greater levels of protection. Thank you for your attention to this matter and please do not hesitate to contact me if you would like to discuss this issue.

Sincerely,

Mallory G. Martin, President
NC Chapter American Fisheries Society
206 N. Madison Street
Marion, NC 28752