



The Nature Conservancy 

September 16, 2021

Marla Koberstein
 Water Quality Standards Project Manager
 Washington State Department of Ecology
 PO Box 47600
 Olympia, WA 98504-7600

Re: Comments on 2021 Triennial Review of Surface Water Quality Standards: Draft Work Plan to Update the Water Quality Standards for 2022-2024

Dear Ms. Koberstein:

We, the undersigned 50 organizations, appreciate the opportunity to comment on the Washington Department of Ecology’s 2021 Triennial Review of Surface Water Quality Standards: Draft Work Plan to Update the Water Quality Standards for 2022-2024 (Draft Work Plan), dated July 2021. We support Ecology’s work to comply with the federal Clean Water Act and review surface water quality standards through the Triennial Review process. This process is essential to identify priorities for work that Ecology is going to undertake between 2022 and 2024.

Our organizations support efforts to protect the ecologically, culturally, and recreationally important rivers, streams, and wetlands, in Washington State. These waterbodies provide clean drinking water for communities, support local economies, are critical to the health and abundance of fish and wildlife species, and provide numerous recreation opportunities for Washingtonians and visitors including fishing, boating, hiking and camping. Equally important, Washington’s rivers and streams provide the foundation for supporting tribal treaty rights and lifeways of several sovereign tribes who have stewarded these lands for time immemorial.

Safeguarding Washington's rivers will ensure that these treasures are protected for current and future generations.

The Draft Work Plan includes a list of projects that Ecology is initiating or considering undertaking between 2022-2024. Among the projects being considered are rulemakings in response to requests to update the state water quality standards and designate several river systems as Tier III(A) Outstanding Resource Waters (ORWs) pursuant to WAC 173-201A-330. Nominations to designate the Cascade River (Skagit County), Green River (Skamania and Lewis counties), and Napeequa River (Chelan County) were submitted to Ecology on June 24, 2021 by several of the undersigned organizations.

The federal Clean Water Act provides an opportunity for states to identify their highest quality waters as outstanding resource waters and provide extra protection from future sources of degradation. ORWs are high quality waters that constitute an outstanding state resource due to their extraordinary water quality or ecological or recreational values. Once a water is designated as a Tier III(A) ORW, it needs to be maintained and protected from all degradation. Although Washington has an abundance of high-quality waters that are important to protect, to date Ecology has not designated any ORWs. Other western states, including Oregon, Colorado, New Mexico and Arizona have taken advantage of this opportunity under the Clean Water Act to protect priority rivers.

The Cascade, Green and Napeequa rivers in Washington State all meet multiple regulatory criteria for ORW designation and are deserving of protection as ORWs. All three of the river systems are pristine and located in protected areas; have both excellent water quality and regionally unique recreational value; and have statewide ecological significance. Designation of these river systems would benefit the state's people, its economy, its wildlife, and its salmon. It is essential that the state take steps now to protect some of its remaining high-quality rivers that provide numerous benefits to Washingtonians. As impacts from climate change become increasingly more evident, protecting our high-quality rivers and streams is an essential investment for our future.

Thank you for the opportunity to comment. We urge Ecology to prioritize ORW rulemakings for the Cascade, Green (Mount St. Helens), and Napeequa rivers in the final work plan, which will reflect projects Ecology will initiate from 2022-2024.

Sincerely,

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