



September 27, 2023

Laura Watson, Director
 Washington State Department of Ecology
 PO Box 47600
 Olympia, WA 98504-7600

Re: Designation of the Cascade River (Skagit County), Green River (Skamania and Lewis counties), and Napeequa River (Chelan County) as Tier III(A) Outstanding Resource Waters under the Clean Water Act

Dear Director Watson:

The 60 undersigned organizations and businesses represent conservation and civic groups, local businesses, and other Washington State stakeholders. We write today in support of designating several river systems as Tier III(A) Outstanding Resource Waters (ORW) pursuant to WAC 173-201A-330. Nominated rivers we support for designation include the Cascade River (Skagit County), Green River (Skamania and Lewis counties), and Napeequa River (Chelan County).

Our organizations support efforts to protect the ecologically, culturally, recreationally, and economically important rivers, streams, and wetlands in Washington State. These waterbodies provide clean drinking water for communities, support local economies by providing affordable access to clean water, 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. Additionally, many of us believe that we have a moral obligation to protect and steward God's creation, including free flowing wild rivers, lakes and streams and the fish and wildlife that rely on them for sustenance. Safeguarding Washington's rivers will ensure that these treasures are protected for current and future generations.

Designating rivers that have high water quality and ecological values is an important step to protect what we have, while we continue to invest in the hard and expensive work to restore what we have lost. Outstanding Resource Water designations are consistent with, and support, the hundreds of millions of dollars that have already been invested in salmon recovery, river restoration and safe clean drinking water by tribal, state, and municipal governments.

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. 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. In 2022, the Department moved forward with a rulemaking process for designation of these three rivers as Outstanding Resource Waters. To date more than 140 stakeholders have expressed their support for these designations.

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 appreciate that the Department of Ecology has prioritized Outstanding Resource Waters rulemakings for the Cascade, Green (Mount St. Helens), and Napeequa rivers and offer our strongest support to protect these high-quality resources of statewide significance.

Sincerely,

Tom Uniack
Executive Director
Washington Wild

Kim McDonald
President
Fish Not Gold

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater

Peter Bahls
Executive Director
Northwest Watershed Institute (Port Townsend)

Ashley Short
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Cascade Forest Conservancy (Vancouver)

Marnie Jackson
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Whidbey Environmental Action Network

Sarah Dyr Dahl
Northwest Region Director
American Rivers

Caitlin Singer
Quality & Sustainability Manager
Georgetown Brewing Company

Brad Throssell
State Chair
Washington Council of Trout Unlimited

Rob Smith
Northwest Regional Director
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Joseph Bogaard
Executive Director
Save Our wild Salmon Coalition

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Owner and Artist
Ravenstone Tiles (Port Townsend)

Raymond Kwan & Barry Chan
Owners
Lucky Envelope Brewing

Brandon Wiley
Beer Guy
Bottleworks

John Marti
Brewer/Owner
Lowercase Brewing

Michael Morrison
Board Chair
Pacific Rivers

CaraMia and Kevin Murry
Owners
Hot Cakes

Colin Lenfesty-Jason Daugherty
Owner/Head Brewer-Sales & Operations Manager
Holy Mountain Brewing Co

Ryan Talbott
PNW Conservation Advocate
WildEarth Guardians

Nick Berger
Manager & CEO
The Good Society Brewery

Lauren Hipp, Lisa Huang, Matt Hipp, Thomas Furey
Owners
Halcyon Brewing Co

Nick Ladd & Jessie Quan
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Ladd & Lass Brewing

Leslie Shore
Head Brewer
Pike Brewing Co

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Dave Riddile
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Here Today Brewery & Kitchen

Chad Roberts
Co-owner
Varietal Beer

Nick Bently & Gillian Palmer
Co-owners
Petite Bottle Shop

Ellen Goddard
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IX Lives Brewing

Bud Ransome
Owner
Ravenna Brewing

Trish Rolfe
Executive Director
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Ron Swarner
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Peaks & Pints (Tacoma)

Derek Brown
Owner/Brewer
Bizarre Brewing

Kelsey, Ben, Liz & Craig Curran
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Watershed Pub & Kitchen

J Michelle Swope
Washington State Coordinator
Native Fish Society

Robert Brenlin
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Latona, Fiddler's Inn, Hopvine Pubs

William E. Derry
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Hellbent Brewing Company

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Old Schoolhouse Brewery (Winthrop, WA)

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Olympic Forest Coalition (Quilcene, WA)

Phil Fenner
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North Cascades Conservation Council

Laurie Kerr
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Great Old Broads for Wilderness

Mark Boyar
President
MidFORC Coalition

Lee First
Waterkeeper
Twin Harbors Waterkeeper (Cosmopolis, WA)

Claire Waltman
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Eastside Audubon Society (Kirkland, WA)

Whitney Neugebauer
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Whale Scout

Justin Gerardy
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Standard Brewing / Sovereign Brewing

Rein Attemann
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Washington Conservation Action

Brian Strumke
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Stillwater Artisanal (Grand Mound, WA)

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YaYa Brewing Company (Spokane, WA)

Jill Silver
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10,000 Years Institute (Forks, WA)

Susan Chatlos-Susor
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Sara Giuffrida
Owner, Marketing / Partnerships
Dru Bru Taproom & Brewery (Snoqualmie Pass, WA)

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Dan Streiffert
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Gabriel Villenave
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