**Richard J. Bowers**

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Marla Koberstein

Washington Department of Ecology -- Water Quality Program

300 Desmond Dr. SE Lacey, WA 98503

**Re: Designation of the Cascade, Green & Napeequa Rivers (Skagit, Skamania & Chelan Counties) as Tier III(A) Outstanding Resource Waters under the Clean Water Act.**

Dear Ms. Koberstein:

As a hiker, paddler, outdoor and wildlife photographer, and as a resident of Washington State for more than two decades, I am writing in support of the proposed rulemaking to establish the first of Washington’s Tier III (A) Outstanding Water Resources (ORV) pursuant to WAC 173-201A-330.

I have paddled sections of both the Cascade and Green Rivers, and, as a photographer, I have spent days and weeks with my camera in and around Mount Saint Helen’s National Volcanic Monument, Cascade Pass, North Cascades National Park, and the Glacier Peak Wilderness. I have not yet been lucky enough to visit, hike, and photograph the Napeequa River drainage, but I look forward to doing so in the future. I do, however, have a bottle of 2018 Napeequa Valley red from Glacier View Cellars!

ORV designation will protect existing high water quality for the environment, wildlife, and recreation on each of the nominated pristine reaches and provide the highest level of water quality-based protection under the state Water Pollution Control Act, Ch. 90,48 RCW, and Ecology’s antidegradation program. It will also protect some amazingly beautiful watersheds, wetlands, and critical and unimpaired headwater streams and creeks that establish the standards for salmon, wildlife, and scenic, community and recreational (quality of life) values far downstream.

I urge the Department to provide needed state protections to approximately one-hundred-forty-nine miles of the Cascade River and its tributaries, forty-four miles of the Green River and tributaries, and thirty-five miles of the Napeequa River.

Prior to my photography work, I was involved for over thirty years in land and water resource conservation work at the local Whatcom County, regional and national levels. This included working to support and expand National Wild and Scenic River (W&S) designations, Clean Water Act protections, and state land and river protections including those here in Washington State. For the Cascade River, currently protected under W&S, ORV designation would provide protection to undesignated parts of the basin. Also, W&S status by itself does not provide the same water-quality-based protections as an ORW designation.

The beautiful rivers and streams here in Washington State, more than seventy-thousand miles, are a real treasure. And the state has been involved in some of the nation’s most prominent and important efforts to improve and restore water quality and quantity -- including high profile dam removals on the Elwha, White Salmon, Middle Fork Nooksack, and other rivers. However, Washington State lags behind many other states in terms of both ORV and W&S designations (with only one-hundred-and ninety-seven miles protected as W&S -- less than 3/10’s of one percent). The Cascade, Green, and Napeequa designations, the first to provide ORV protection in Washington, offer a great opportunity to more strongly protect the state’s outstanding waterways.

Finally, as impacts from climate change become increasingly more evident, protecting our state’s high-quality rivers and streams is an essential investment for our future. I again urge the Department of Ecology to provide needed state protections to the Cascade, Green and Napeequa Rivers – and to undertake future rulemakings that would expand ORV protection to the other rivers in Washington that showcase the amazing inheritance and abundance of outstanding natural resources available to those who live, work in, and visit Washington State.

Sincerely,

Richard J. Bowers

Whatcom Land Trust, Executive Director, retired.

Nooksack Salmon Enhancement Association, former interim Executive Director.

Hydropower Reform Coalition, founding member and former Western States Coordinator.

American Whitewater, former Executive Director