

September 27, 2023

Marla Koberstein
Rulemaking Lead
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Outstanding Resource Waters, Chapter 173-201A WAC, Proposed Rule Designation of the Cascade River, Green River, and Napeequa River as Tier III(A) Outstanding Resource Waters under the Clean Water Act

Dear Ms. Koberstein:

My name is Paula Swedeen and I am the Policy Director for Conservation Northwest. I am submitting comments today on behalf of the organization and its members. We write today in support of the proposed rulemaking to adopt parts of three river systems as Tier III(A) Outstanding Resource Waters pursuant to WAC 173-201A-330. We strongly urge Ecology to adopt the new rule and designate the upper reaches of the Cascade River (Skagit County), Green River (Skamania County), and Napeequa River (Chelan County) as Outstanding Resource Waters.

Conservation Northwest was founded in 1989 and works to protect, connect, and restore the wildlands and wildlife of the Pacific Northwest. We work primarily in Washington State and British Columbia. High quality, intact river systems are crucial to the ecological integrity of our region and support numerous fish and wildlife species, including federally listed salmon and trout species, and serve as landscape connectivity corridors and climate refugia.

These waterbodies also serve as critical life-support systems for people that provide clean drinking water for communities, support local economies, and offer unparalleled recreation opportunities for Washingtonians and visitors alike. And they provide the foundation for supporting Tribal treaty rights and lifeways of the sovereign tribes who have inhabited and stewarded these lands since time immemorial.

Climate change makes these conservation efforts even more urgent. From the latest report by the UN's Intergovernmental Panel on Climate Change, we know that halting emissions will not be sufficient; we must also remove and prevent carbon from entering the atmosphere by protecting natural ecosystems and the "living carbon" they embody. Science also tells us that certain areas and species will be impacted more quickly and severely, including freshwater ecosystems, which are declining at a rate faster than terrestrial and marine ecosystems. Mapping of connectivity corridors throughout the state has also show that intact riparian areas fulfill the role of allowing birds, mammals, amphibians, and plants to move where they need for seasonal, annual, and long-term life history needs. This need for movement is heightened by the need for species to find more suitable habitat as the climate changes. By increasing protection of still-healthy river systems, we are giving those systems and the communities that rely on them their greatest chance at a resilient future.

We consider the adoption of these rivers as ORWs to be a necessary step to protect the natural resources we still have intact, while we continue to invest in the hard and expensive work of restoring

what we have lost. A recent report in *Nature* by Professor Kristie Ebi of the University of Washington Center for Health and the Global Environment and a coalition of other scientists from across the globe finds that more than 50-60% of natural ecosystem areas must be protected and maintained to preserve ecosystem benefits and human well-being—one of eight scientifically established boundaries necessary for a “safe and just” system. Not only are we failing this measure, but land and water degradation is rapidly increasing. Designating ORWs constitutes a tangible solution and imperative action for stemming loss and moving in the right direction.

Each of the three rivers under consideration fulfills several of the ORW criteria, any one of which would qualify them for this meaningful designation. These qualities demonstrate that these waters are deserving and needful of protection – their strengths are also what make the rivers vulnerable to future impact and degradation. Outstanding resource water designations are also consistent with the hundreds of millions of dollars that have already been invested in salmon recovery, river restoration, climate resilience, and safe, clean drinking water by Tribal, state and municipal governments in the region, and will further those investments and continuing efforts.

Thank you for the opportunity to comment. We recognize and 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 and greater significance.

Sincerely,

Paula Swedeen, Ph.D.
Senior Director, Policy
Conservation Northwest
Olympia, WA

