



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 undersigned 4 organizations and businesses represent members of the angling and hunting outdoor community in Washington. Collectively, we represent thousands of members, year-round employees, seasonal guides, and citizens who are deeply invested in the health of our state's rivers. We write today in support of designating several river systems as Tier III(A) Outstanding Resource Waters 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 and businesses support efforts to protect the ecologically, culturally, and recreationally important rivers, streams, and wetlands, in Washington State. These waterways provide a multitude of ecosystem services including clean drinking water for communities, habitat that is critical to health and abundance of fish and wildlife species, scenic beauty that is a defining attribute of our quality of life, and numerous recreational opportunities for residents and visitors including fishing, hunting, boating, hiking and camping. Outdoor recreation supports \$26.5 billion in annual expenditures and 264,000 jobs throughout Washington State. In addition, our waterways serve as the foundation for supporting Tribal Treaty rights and lifeways.

Protecting unimpaired headwaters is critical to the health of our rivers and everything downstream. The Clean Water Act recognizes the unique value of waterways of exceptional water quality and provides an opportunity for states to identify waterways as Outstanding Resource Waters. The rivers being considered, the first for Washington State, represent outstanding state resources due to their extraordinary water quality, ecological, and recreational values. When a river is designated as Tier III(A) Outstanding Resource Waters, 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 Outstanding Resource Waters. Other western states, including Oregon, Colorado, New Mexico, and Arizona have taken advantage of this opportunity under the Clean Water Act to protect priority river.

The Cascade, Green and Napeequa rivers in Washington State meet multiple regulatory criteria for Outstanding Resource Waters designation and are deserving of protection as Outstanding Resource

Waters. 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 sporting heritage, 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 such as salmon recovery, safe and clean drinking water and freshwater inputs to the Puget Sound. As impacts from climate change become increasingly more evident, protecting our high-quality rivers and streams is an essential investment for our future.

Today, wild trout, salmon and steelhead stocks are in precipitous decline in almost all the Western watersheds, including Washington State. We are in a desperate race against the impacts of a warming climate and other pressures. Wildlife including big game mammals and waterfowl are also being negatively impacted by climate change. We simply must do more to safeguard clean, cold water in our last best rivers and streams.

Thank you for the opportunity to comment. We appreciate that the Department of Ecology has prioritized Outstanding Resource Waters rulemakings for the Cascade, Green, and Napeequa rivers and offer our strongest support to protect these high-quality resources of statewide significance.

Sincerely,

Dean Finnerty  
NW Director of the Angler Conservation  
Program  
Trout Unlimited

Dave McCoy  
Founder  
Emerald Water Anglers

Pat Hesselgesser  
Chair  
Washington Council of Trout Unlimited

Steve Jones  
President  
Washington State Council, Fly Fishers  
International

Blake Merwin  
Owner  
Gig Harbor Fly Shop (Gig Harbor)

J Michelle Swope  
Owner  
Oly Women On The Fly

Brett Wedeking  
Owner  
Tailout Anglers

Justin Waters  
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All Waters Coffee Company

J Michelle Swope  
President  
Olympia Chapter of Trout Unlimited