Washington Wild

Hello, please accept comments from 60 organizations and businesses in support of Outstanding Water Resource designations for the Green, Cascade, and Napeequa Rivers.



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 highquality 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,

Kim McDonald
President
Fish Not Gold
Peter Bahls
Executive Director
Northwest Watershed Institute (Port Townsend)
Marnie Jackson
Executive Director
Whidbey Environmental Action Network
Caitlin Singer
Quality & Sustainability Manager
Georgetown Brewing Company
Rob Smith
Northwest Regional Director
National Parks Conservation Association

Joseph Bogaard Executive Director Save Our wild Salmon Coalition

Laura Reutter 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 Owners Ladd & Lass Brewing

Leslie Shore Head Brewer Pike Brewing Co Shawna Cormier & Jess Keller Poole Co-founders Seattle Beer School

Dave Riddile Co-owner Here Today Brewery & Kitchen

Chad Roberts Co-owner Varietal Beer

Nick Bently & Gillian Palmer Co-owners Petite Bottle Shop

Ellen Goddard Co-owner IX Lives Brewing

Bud Ransome Owner Ravenna Brewing

Trish Rolfe Executive Director Center for Environmental Law & Policy

Ron Swarner Owner Peaks & Pints (Tacoma)

Derek Brown Owner/Brewer Bizarre Brewing

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

J Michelle Swope Washington State Coordinator Native Fish Society

Robert Brenlin Owner/Operator Latona, Fiddler's Inn, Hopvine Pubs

William E. Derry President Pilchuck Audubon Society (Snohomish, WA) Jack Guinn Owner Hellbent Brewing Company

Jacob Young Owner & GM Old Schoolhouse Brewery (Winthrop, WA)

Connie Gallant President Olympic Forest Coalition (Quilcene, WA)

Phil Fenner President North Cascades Conservation Council

Laurie Kerr Leader, Cascade Volcanoes Chapter Great Old Broads for Wilderness

Mark Boyar President MidFORC Coalition

Lee First Waterkeeper Twin Harbors Waterkeeper (Cosmopolis, WA)

Claire Waltman Chair, Conservation Committee Eastside Audubon Society (Kirkland, WA)

Whitney Neugebauer Executive Director Whale Scout

Justin Gerardy Owner Standard Brewing / Sovereign Brewing

Rein Attemann Puget Sound Campaigns Manager Washington Conservation Action Brian Strumke Owner Stillwater Artisanal (Grand Mound, WA)

Jason Gass Co-Founder YaYa Brewing Company (Spokane, WA)

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

Susan Chatlos-Susor President Friends of Heybrook Ridge (Index, WA)

James Dixon, Mario Savage, & David Dixon Owners 23rd Ave Brewery

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

Brian Stan Co-Founder Old Stove Brewing

Dan Streiffert Conservation Chair Rainier Audubon Society (Auburn, WA)

Craig Nobley General Manager Lighthouse Roasters

Gabriel Villenave Managing Partner Outer Planet Brewing