



**YAKIMA RIVER RUNNERS** NORTHWEST **mountain school**



September 27, 2023

Marla Koberstein  
Washington Department of Ecology  
Water Quality Program  
300 Desmond Dr SE  
Lacey, WA 98503

*Re: Designation of the Napeequa River (Chelan County) as Tier III(A) Outstanding Resource Waters under the Clean Water Act*

Dear Ms. Koberstein:

The 10 undersigned organizations and businesses represent conservation and civic groups, elected officials, local businesses and other Washington State stakeholders who represent residents of Chelan, Kittitas, Yakima Counties. We write today in support of the proposed rulemaking to designate the Napeequa River system as a Tier III(A) Outstanding Resource Water (ORW) pursuant to WAC 173-201A-330 and strongly urge Ecology to adopt the new rule.

We reside, serve, or represent individuals in northcentral Washington State who support efforts to protect the ecologically, culturally, recreationally and economically important rivers, streams, and wetlands, in Washington State, including the Napeequa River watershed.

We consider adoption of the Napeequa River system as an ORW 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.

Climate change makes these conservation efforts even more urgent. Science 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. 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.

The Napeequa River in Washington State meets several of the ORW regulatory criteria, any one of which would qualify it for this meaningful designation. The Napeequa River has not been impacted by centuries of human development. It's cold, pristine waters provide critical habitat for species, such as endangered Spring chinook and threatened bull trout. Both the White River and Lake Wenatchee rely on critical inputs from the Napeequa, their high-quality waters also providing habitat for downstream salmon and trout. The abundance and diversity of species present in the area underline the vital interconnectedness of the river systems.

In an era of compounding crises, such as climate change and biodiversity loss, ecosystems like the Napeequa River deserve and require the highest level of protection. This glacial river will become more critical over time, as climate change drives water temperatures up throughout the watershed, threatening salmon and other aquatic species that rely on cold water.

The Napeequa is also notable for its geologic history and features. Because the Napeequa carves through a narrow, rugged canyon, a variety of ecosystems coexist—glaciers, alpine forests, old-growth forests, meadows, wetlands, and river frontage all sit side-by-side.

Designation of this river system 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 recognize and appreciate that the Department of Ecology has prioritized ORW rulemaking for the Napeequa River and offer our strongest support to protect this high-quality resource of statewide significance.

Sincerely,

Arthur Campbell  
President  
North Central Washington Audubon Society  
(Wenatchee)

Lance Reif  
Co-owner  
Wildwater River Guides (Leavenworth)

Levi Wyatt  
Corporate Social Responsibility Manager  
Yakima Chief Hops (Yakima)

Pamela Brulotte  
Founder  
Icicle Brewing Company (Leavenworth)

John & Olivia Race  
Owners  
Northwest Mountain School (Leavenworth)

Steve Loitz  
President  
Kittitas Audubon Society (Ellensburg)

Gus Bekker  
President  
El Sendero Backcountry Ski & Snowshoe  
Club (Wenatchee)

Michael Aquilino  
President  
Yakima River Runners (Yakima)

Margie Van Cleve  
Conservation Chair  
Sierra Club Washington Chapter

Kevin and Meghann Quinn  
Co-Owner  
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