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September 5, 2023

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

submitted electronically through Department of Ecology Public Comment Form

Re: Designation of the Green River (Skamania and Lewis counties) as a Tier III(A) Outstanding Resource Water under the Clean Water Act

Dear Ms. Koberstein:

The Vancouver Audubon Society represents members residing in Klickitat, Skamania and Clark counties. We support the proposed rulemaking to designate 44 miles of the Green River and its tributaries as a Tier III(A) Outstanding Resource Water (ORW) pursuant to WAC 173-201A-330 and strongly urge the Department of Ecology to adopt the new rule.

Our members rely on the Green River watershed in the shadow of Mount St. Helens to sustain our local economies, clean water, public health, responsible recreational opportunities including wildlife observation, and quality of life. This land is also culturally and spiritually significant to the Cowlitz Indian Tribe and the Confederated Tribes and Bands of the Yakama Nation. Nearby, Mount St. Helens (Lawetlat'la) is listed as a Traditional Cultural Property in the National Register of Historic Places due to its significance in traditional beliefs and cultural identity for both Tribes.

We support designation of the Green River system as an ORW to recognize its outstanding natural resources, particularly those that survived the 1980 eruption of Mount St. Helens. The Green River meets several of the ORW regulatory criteria.

The Green River, a main tributary of the North Fork Toutle River in the Cowlitz River Basin, is a laboratory for landscape recovery and ecosystem resilience following the catastrophic disturbance of a volcanic eruption. The nominated reaches flow through the Mount St. Helens National Volcanic Monument and the area includes inventoried roadless areas within the Gifford Pinchot National Forest. It is an eligible Wild and Scenic River candidate, a state designated gene bank for wild steelhead, and provides excellent and important spawning habitat for endangered salmon.

### Significant Scientific and Ecological Values

Shielded from Mount St. Helens by high ridges, about two-thirds of the eight linear miles of ancient Douglas-fir and western red-cedar forest in the Green River valley that had so far survived the chain saws also survived the eruption.

Today, recreation access is a five-mile hike one-way in a deep, narrow valley with large trees more than 400 years old. The untouched forest is representative example of North Pacific Maritime Mesic-Wet Douglas-fir Western Hemlock Forest, which has a conservation status of Vulnerable (S3S4)<sup>1</sup> The stand structure is closed canopy with high vertical structural diversity and large woody debris. Many historical occurrences of this system have become conifer plantations and logging of remaining intact stands remains a threat, hence this remaining primeval forest was included in the boundaries of the Mount St. Helens National Volcanic Monument.

Upstream, in the blast zone and both inside and outside the monument boundaries, the forest is naturally recovering except in areas that were salvage-logged in the early 1980s and replaced with plantations, which have resulted in less diverse tree canopies, a shortened stand initiation phase, and truncated succession. The naturally developing forest demonstrates early seral shrub species, local tree gene pools, diverse tree species and canopy heights, and abundant coarse woody debris. Thus, the Green River valley presents an area to compare and contrast natural and plantation forests and understand how forests recovered over time following volcanic disturbance.

### Mineral Deposit Causes National Monument Exclusion

A mineral deposit was discovered on Goat Mountain by the Duval Corporation in 1969 with subsequent active exploration from 1971-1980. The eruption of Mount St. Helens halted all fieldwork in 1980. Duval held patents for these lands under the Mining Law of 1872.

As bipartisan bills to create the Mount St. Helens National Volcanic Monument, with overwhelming support, advanced through both the House and Senate in June 1982, President Ronald Reagan threatened to veto the bill, complaining that it would tie up mining claims. In Conference Committee, Congress redrew the monument boundary to exclude the mining claims to make the bill more acceptable to the administration. The Senate passed it without dissent and the House passed it 393-8. Reagan signed the bill on August 26, 1982.

Duval divested its hardrock mineral holdings in 1984. The Trust for Public Land acquired an undivided 50 percent interest in MS 708 and subsequently donated that interest to the U.S. Forest Service. Using federal Land and Water Conservation Funds, the U.S. Forest Service purchased the other tracts with patented claims with the direct, written objective that the lands be conserved and protected.

### Fish and Wildlife Habitat

The Green River is home to ecologically important and threatened habitats and species, including the state and federally-listed northern spotted owl and Roosevelt elk. The Green River is a state-designated gene bank for wild winter steelhead. Chinook and coho salmon, summer steelhead and sea-run cutthroat use the Green River. The Green River plays a crucial role in the North Fork Toutle River Steelhead Recovery Plan.

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<sup>1</sup> Roccio, Joe and Rex Crawford. *Ecological Systems of Washington State: A Guide to Identification*. Washington Department of Natural Resources, Natural Heritage Report 2015-04; Olympia, WA, 2015; pp. 75-79.

Ryan Lake, adjacent to the Green River and within its watershed, is a birding hotspot<sup>2</sup> on eBird with 52 species reported. Birding is best in April-June when birds make their presence known through territorial singing and other displays. Otherwise, birds can be hard to see in dense forests.

### Recreation

The Green River valley offers diverse recreational opportunities including hiking, horseback riding, mountain biking, fly fishing, birding, botanizing, hunting, foraging, backpacking and camping.

These recreational opportunities contribute to the recreation economy: A commercial outfitter provides llama-supported 4 night/5 day trips that make a loop using the Green River Trail #213, Vanson Ridge Trail #213A, and Goat Mountain Trail #217.<sup>3</sup>

As the new forest grows back, there could be the opportunity to reestablish the Green River Trail #213 to the river's headwaters near the current Norway Pass trailhead and the pre-eruption Miners Creek Trail #212 to restore more long-distance trail recreation and reconnect to the trail system in the Mount Margaret Backcountry that existed prior to 1980. Trail users express a desire for more long-distance and loop opportunities, which can help spread out users, reduce congestion and foster feelings of solitude.

### Summary

Designation of the Green River as an ORW would recognize its important ecosystem values and protect a high-quality river that provides numerous benefits for both Washington's landscape and its people. As climate change impacts increase and become more evident, protecting our remaining high-quality rivers and streams is an essential ecological investment for our future. We need to protect the Green River's water quality from any future degradation.

Thank you for initiating the first proposed designations of ORWs in Washington.

Sincerely,



Susan Saul  
Conservation Chair  
conservation@vancouveraudubon.org

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<sup>2</sup> [ebird.org/hotspot/L3786759](https://ebird.org/hotspot/L3786759): accessed 16 August 2023.

<sup>3</sup> [wallamas.com/2019/02/18/vanson-lake-loop](https://wallamas.com/2019/02/18/vanson-lake-loop): accessed 16 August 2023.