

Washington Native Plant Society

Thank you for considering the comment letter provided by the Washington Native Plant Society Conservation Committee, and State Board of Directors, in response to Rulemaking - Outstanding Resource Waters, Chapter 173-201A WAC comment period.



Washington Native Plant Society

Appreciate, Conserve, and Study Our Native Flora

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

Submitted electronically through the Department of Ecology Public Comment Form

Re: **Rulemaking – Outstanding Resource Waters, Chapter 173-201A WAC.** (Designation of the Cascade River, Green River, and Napeequa River as Tier III(A) Outstanding Resource Waters and designation of Soap Lake as Tier III(B) Outstanding Resource Waters, all under the Clean Water Act.)

Dear Marla Koberstein:

The Washington Native Plant Society (WNPS) supports designation of three nominated river systems as Tier III(A) and one lake as Tier III(B) Outstanding Resource Waters (ORW) pursuant to WAC 173-201A-330: the Cascade River, Green River, Napeequa River, and Soap Lake.

WNPS is a non-profit organization with 12 local chapters and over 2500 members statewide. For over 45 years, WNPS members have prioritized conservation of intact native plants and plant habitats for their intrinsic ecologic function and value. Native algae, fungi, and lichens are also primary species of interest to WNPS. WNPS promotes the appreciation of native plants and their habitats with a variety of educational and conservation activities that are open to the public and include studying plants in their native habitats – botanizing.

Botanizing is a scientific and recreational activity that has a long history in Washington. Rooted in the oral traditions of our state's First Peoples, documented in the journal of botanist and explorer David Douglas, and continuing today on the web with the meticulous records of the Burke Herbarium and the WNPS plant lists compiled by our membership, botanizing is a discipline worthy of recognition, promotion, and protection. Observations of citizen-botanists have contributed to the human knowledge base of all cultures for thousands of years. **Protecting vulnerable habitats and rare plant species ensures that current and future generations will experience and benefit from functional and biologically diverse natural environments in Washington.**

WNPS believes that designation of these rivers and the lake (which includes their associated native plant habitat as integral to their identity) will appropriately recognize their status as waters that are outstanding and will help protect them from future degradation.

Cascade River (Skagit County)

WNPS supports the designation of the Cascade River system (portions as nominated) as a Tier III(A) ORW in recognition of its status as an outstanding natural resource. WNPS agrees with the nomination assessment that this river system meets the criteria for outstanding: it is in pristine condition in a protected area (the river is in North Cascades National Park, Mt. Baker-Snoqualmie National Forest, and Glacier Peak Wilderness), has high water quality and regionally unique recreational value, and has statewide ecological significance.

This Cascade River System is within the North Pacific Montane Riparian Woodland and Shrubland ecosystem, the primary riparian system in the Pacific silver fir (*Abies amabilis*) and mountain hemlock (*Tsuga mertensiana*) zones on both sides of the Cascade crest.

The WNPS Cascade Pass plant list, collected during multiple trips in the area adjacent to the Cascade River system headwaters between 1986 and 2018, documents the presence of 172 plant species – 168 native and 4 introduced. It includes the subalpine and alpine plants expected in the undisturbed regions of the Washington Cascades. WNPS observations indicate that this is an intact ecosystem with only a very few invasive species present. This supports the assertion that this is a pristine environment, largely free from human sources of degradation. Native plant habitat and water quality are mutually dependent. The Cascade River system's water quality and its terrestrial species, old growth forests and priority habitats, are mutually dependent. WNPS believes designation of the Cascade River as a Tier III(A) is appropriate, will ensure its waters remain pristine, and thereby will benefit the native plants and habitats that WNPS and the people of Washington value.

Green River (Skamania and Lewis Counties)

WNPS supports designation of the Green River system (portions nominated) as an ORW Tier III(A) in recognition of its status as an outstanding natural resource, particularly noting its resilience having survived the 1980 eruption of Mount St. Helens. WNPS agrees with the nomination assessment that this river system meets the criteria for outstanding: its relatively pristine condition, its occurrence in a National Monument, its high water quality and unique recreational value, and its statewide ecological significance. 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. Shielded from Mount St. Helens by high ridges, about two-thirds of the eight linear miles of 400-year-old Douglas-fir and western red-cedar forest in the Green River valley survived the 1980 eruption.

The untouched forest is a representative example of North Pacific Maritime Mesic-Wet Douglas-fir Western Hemlock Forest, which has a conservation status of Vulnerable (S3S4). 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, but these stands on the Green River are protected by the Mount St. Helens National Volcanic Monument. 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. 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.

WNPS members, including member scientists and conservation advocates, have taken a particular interest in the eruption's effects and restoration processes. WNPS believes designation of the nominated upper Green River as ORW Tier III(A) more than meets designation criteria and will recognize the unique quality and power of this evolving river landscape.

Napeequa River (Chelan County)

WNPS supports designation of the Napeequa River system (portions nominated) as an ORW Tier III(A) in recognition of its status as an outstanding natural resource. WNPS agrees with the nomination assessment that this river system meets the criteria for outstanding: its relatively pristine condition and location primarily within protected lands (Glacier Peak Wilderness), its high water quality and recreational value, and its statewide ecological significance.

The WNPS plant list for the Napeequa Valley documents the presence of 98 plant species, all natives. It includes the native plants expected in the undisturbed regions of the Washington Cascades. WNPS observations indicate that this is an intact ecosystem with no documented invasive species present. This supports the assertion that this is a pristine environment, largely free from human sources of degradation. As noted, native plant habitat and water quality are mutually dependent. The Napeequa River system's geology, within a rugged canyon, results in a variety of plant habitats that support native plant diversity. WNPS believes designation of the Napeequa River as a Tier III(A) is appropriate, will ensure its waters remain pristine, and thereby will benefit the native plants and habitats that WNPS and the people of Washington value.

Soap Lake (Grant County)

WNPS supports the designation of Soap Lake as an ORW Tier III(B) in recognition of its status as an outstanding natural resource. Although a significant contrast to the three nominated rivers, WNPS agrees with the nomination assessment that this lake meets the criteria for outstanding: the water has unique aquatic habitat types and is regionally rare, the water is of high quality and has regionally unique recreational value, and the water is of exceptional statewide ecological significance.

Although WNPS does not have a plant list specifically for Soap Lake, the Sun Lakes list, compiled summer of 2004, covers plants found at Dry Falls Lake in Sun Lakes State Park. The Sun Lakes list documents a total of 402 species, 330 native and 72 introduced. The list supports our premise that the shores of Soap Lake may hold interesting and diverse plant habitats, dependent on the continued water quality of the lake. The list covers the northernmost lake of the Sun Lakes chain whereas Soap Lake is the southernmost lake (therefore most salty) and note that harsh conditions and increased mineralization can result in exceptional species diversity as is additionally supported by the unique bacterium of the lake. Because the lake has a long and ongoing history of human use, which adds to its unique quality, WNPS agrees ORW Tier III(B), rather than Tier III(A), as recommended, is appropriate.

Thank you for the opportunity to comment. WNPS appreciates that the Department of Ecology has prioritized Outstanding Resource Waters rulemakings and supporting regulations for the Cascade, Green (Mount St. Helen's), and Napeequa Rives and for Soap Lake. We support protection of these high-quality resources of state-wide importance.



Keyna Bugner, President
Washington Native Plant Society



Becky Chaney, Conservation Chair
Washington Native Plant Society