

27 September 2023

Washington Department of Ecology
300 Desmond Drive SE
Lacey, Washington 98503

Dear Ecology Staff,

Thank you for initiating the Outstanding Resource Waters rulemaking process, and for inviting public comment. Review and designation of suitable rivers in our state is long overdue. I urge you to proceed with the process expeditiously and then expand consideration to additional eligible waters in our state.

My relationship with Washington's rivers, including those proposed for designation, is broad and deep. As a scientist, I conduct research on rivers, river restoration, and connections between rivers, wildlife, and landscapes. As an educator, I bring students to rivers where they learn about rivers and their vital roles in our region. As a whitewater boater, I regularly enjoy intimate experiences with rivers on their own terms and I suffer impacts to rivers when our society treats them poorly.

The three rivers being considered for Outstanding Resource Water designation strongly merit that designation. I have led extended course expeditions up the South Fork of the Cascade River, where students collected data on riparian wildlife. I have witnessed extensive recession of the South Cascade Glacier in recent decades. The glacier and its monitoring by USGS are providing valuable information about changes in our rivers and the climate. The value of this work is enhanced by the unimpaired quality of the Cascade River basin, because results have limited confounding influences by development or resource extraction. I witnessed one exception where clearcutting down to the riverbank occurred on the main stem Cascade on land managed by Washington's Department of Natural Resources, in violation of the river's federal Wild and Scenic designation. Outstanding Resource Water designation would help reduce comparable impacts in the future.

The Cascade River is a tributary of the Skagit River, which is the largest sources of freshwater and wild salmon into Puget Sound. The Skagit and adjacent rivers also attract a large congregation of overwintering Bald Eagles, which are drawn to abundant spawning salmon. Those Eagles and salmon depend on river conditions that would be protected by Outstanding Resource Water designation. I have led student groups on raft trips down the Skagit past the Cascade River confluence, where students conducted Bald Eagle counts and gained first-hand experience about river-eagle-salmon relationships described in scientific articles they read. Bald Eagles wintering on the Skagit, Cascade, and adjacent rivers travel here from breeding sites throughout northwestern North America. This remarkable congregation is our region's analog of Monarch butterfly wintering aggregations in central California and Mexico's Michoacán highlands. We should honor their presence here by designating the river.

The Napeequa River also is richly deserving of Outstanding Resource Water designation. While mountaineering in the upper Napeequa basin, I watched a wolverine traverse snowfields that supply the river's headwaters. Wolverines require remoteness and late-lingering snowfields for natal dens. Few people, even researchers, have seen wolverines in the wild unless they use traps or remotely-triggered cameras. My sighting, although anecdotal, is consistent with the Napeequa's exceptional quality. The same qualities that support wolverines also work to create thermal refugia required by many aquatic species, maintain high water quality, and support river flows suitable for multiple recreational uses.

In summary, the rivers proposed for Outstanding Resource Water designation are richly deserving. They fulfill all criteria listed in WAC 173-201A-330. I urge you to proceed with their designation expeditiously. I also urge you to consider additional rivers for review. Washington hosts a wealth and diversity of rivers, many of which are in better condition than rivers in most of the rest of the nation. Only three 10^{ths} of a percent (0.003) of Washington's rivers are designated Wild and Scenic at the federal level. Although pursuing federal designation involves an arduous path through Congress, we can act more rapidly at a state level. Broader application of Outstanding Resource Water review and designation is the appropriate tool. I urge you to apply that tool more extensively in your responsibility to rivers and the people of our state.

Sincerely,



John McLaughlin
Professor