



**SKAMANIA COUNTY  
BOARD  
OF COMMISSIONERS**

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September 26, 2023

Ms. Marla Koberstein  
Department of Ecology  
Water Quality Program  
P.O. Box 47600  
Olympia, WA 98504-7600

Submitted online via Department of Ecology comment form.

Re: Comments on Proposed Outstanding Resource Water Designations

Dear Ms. Koberstein,

We are requesting an extension of the Public Comment period for this complex and complicated ruling to January 15, 2024. Being understaffed and in the throgs of budgeting, changing insurance carriers and software replacement efforts, there has been little time to evaluate the true impact of this decision.

Unfortunately, your department's schedule did not allow for this issue to be presented to the WSAC Timber Counties Caucus in Ellenberg last Wednesday. It would have been an excellent opportunity to address many counties that will be impacted.

Issues of statewide significance for counties are deserving of meetings with you on the proposed Tier III designation with all county commissioners, so we all can hear the information at the same time, listen to the questions we pose and allow us to hear your responses. We propose two zoom sessions in the extended time frame 30 days apart.





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This action appears to be irrevocable and should not be taken lightly.

While your current decision may only affect the counties whose waters are about to be impacted, it will open the doors for all other counties to be subject to the same process. Implementing this without their input lacks transparency.

We respectfully ask you to extend the Public Comment period to January 15, 2023, and in the interim, convene two zoom meetings for all county commissioners.

We, the Board of Skamania County Commissioners are opposed to this action on the county's portion of the Green River and the implementation of the Tier III designation until our questions have been addressed and all other counties have been briefed and had the opportunity to better understand its implications.

There are many questions from different sources that we'd like to see answers to before implementation.

Our county's questions are:

1. This started back in 2022, which means they have been working on it for a much longer time than that. We think only the impacted counties were engaged. Was anyone else? We believe that this level of ruling should be shared with all potential counties up front.
2. Have you given any consideration to the potential number of requests you're going to receive, given anyone can make the ask?
3. What is the timeline for you to respond to a request?
4. What impact will it have on your budget and is the legislature informed of this action and its potential cost?
5. How does being a "non-project" differ than being a "project"?
  - a. What requirements would you have had to meet if it was a project?



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- b. Did this limit engagement with all potential impacted counties?
6. What analysis of the potential economic impact have you done, particularly for counties heavily dependent on active forest management?
- a. Can you clarify for us how much economic impact this will have?  
We've heard that it might close the entire impacted watershed, not just the riparian buffers.
7. Can these be reversed if circumstances dictate?
8. What ownerships does this impact: State Forest Trust and School Trust Lands, Federal Forests or BLM, and/or private holdings, others?
9. How is recreation impacted?

On behalf of the citizens of Skamania County, thank you for your consideration of our ask for an extension of the Public Comments period to Jan. 15, 2024.

Richard Mahar  
Commissioner

T.W. Lannen  
Commissioner

Asa Leckie  
Commissioner