

# Cascade Forest Conservancy

Comments attached as a PDF.

Alluvium Gatherings • Camas Bike & Sport • Cascade Forest Conservancy •  
Cascade Volcanoes Great Old Broads for Wilderness • Clark-Skamania Flyfishers •  
Coyote Ridge Ranch • Dandelion Teahouse & Apothecary • Every Way Fitness •  
Friends of Clark County • Full Plate Farms • Kindred Homestead Supply • LeDuc Montgomery LLC •  
Loo Wit Group of The Sierra Club • Monet Vineyards • Mount St. Helens Institute •  
Mountain Goat Tattoo LLC • Octopi Ink • Raintree Nursery • Starfish Herbs & Acupuncture •  
Vancouver Wildlife League • Wildflower Meadows, LLC

September 26, 2023

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

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

Dear Ms. Koberstein:

The 21 undersigned organizations and businesses represent conservation and civic groups, local businesses, and other stakeholders across southwest Washington. We write today in support of the proposed rulemaking to designate parts of the Green 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 Skamania, Lewis, Cowlitz, and Clark Counties, who 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, 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. Mount St. Helens (Lawetlat'la) is listed in the National Register of Historic Places as a Traditional Cultural Property of both Tribes due to its significance in traditional beliefs and cultural identity.

We consider the designation of the Green 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. The fight to protect the Green River has been underway for well over a decade. Community groups have continually stated that this is no place for a mine and fought a proposed open-pit mine in this watershed for over 15 years. The District Court has found in the communities' favor several times, most recently vacating exploratory drilling permits in January of 2022. Designating the Green River as an ORW constitutes a tangible move by the Department of Ecology to support the community's belief that the Green River is a unique and special place, deserving of additional protection.

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 protections for still-healthy river systems, we are giving those systems and the communities that rely on them the greatest chance at a resilient future.

The Green River in Washington State meets several of the ORW regulatory criteria, any one of which would qualify it for this meaningful designation. The Green River, a main tributary of the North Fork Toutle River in the Cowlitz River Basin, is a shining example of landscape recovery and ecosystem resilience, having rebounded since the 1980 eruption of Mount St. Helens. 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.

The Green River is also home to ecologically important and threatened habitats and species, including the northern spotted owl, Roosevelt elk, and more. The Green River Valley is prized—by locals and tourists alike—for its recreational opportunities, including the popular Green River Horse Camp, the Goat Mountain Trail (with vistas of Adams, St. Helens, Rainier, & Hood), and the Green River Trail (which leads through the Valley of the Giants, four miles of ancient old-growth forest that remained standing after the 1980 eruption). The area provides abundant opportunities for hiking, fly fishing, horseback riding, mountain biking, hunting, foraging, botanizing, and camping. Each of these qualities and services is a resounding testament to the river's qualifications to be a designated Outstanding Resource Water.

Outreach to Tribes, local elected officials, and other stakeholders, prior to an Outstanding Resource Waters nomination for the Green River, generated important feedback that was included in the designation being proposed by the Washington Department of Ecology. During the 101 phase, the nominating coalition met with a concerned timber company and a key change to the nomination was made, focusing the designation on the federal lands managed by the Gifford Pinchot National Forest along the headwaters of the Green River (avoiding the private timber company inholdings within the Gifford Pinchot National Forest and the state trust lands). The amended designation addressed concerns about potential restrictions to local private landowners, private timber companies, and state working forest lands by not including private and state land ownership in the designation.

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 Green River and offer our strongest support to protect this high-quality resource of statewide significance.

Sincerely,

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Alluvium Gatherings  
(Vancouver, WA)

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Owner  
Camas Bike & Sport  
(Camas, WA)

Ashley Short  
Policy Manager  
Cascade Forest Conservancy  
(Vancouver, WA)

Laurie Kerr  
Leader, Cascade Volcanoes Chapter  
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Loo Wit Group of The Sierra Club  
(Southwest WA)

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(Brush Prairie, WA)

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