

April 18, 2025

Marla Koberstein  
Water Quality Standards Project Manager  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

*Re: 2025 Triennial Review of Surface Water Quality Standards: 2025-2027 Draft Workplan*

Dear Ms. Koberstein:

Thank you for the opportunity to comment on the Washington Department of Ecology's (Ecology) Water Quality Program 2025-2027 Draft Workplan (Workplan).

Our organizations, American Rivers, American Whitewater, Cascade Forest Conservancy, The Pew Charitable Trusts, Trout Unlimited, Washington Wild, and the Wild Salmon Center, support efforts to conserve and protect the ecologically, culturally, and recreationally important rivers, streams, and wetlands of Washington State. These waters serve as life-support systems that provide clean drinking water for communities, sustain local economies, and offer unparalleled recreation opportunities for Washingtonians and visitors alike. They are critical to the health and abundance of fish and wildlife species, including endangered and rapidly declining salmon and trout species. These waters also provide the foundation for supporting Tribal treaty rights and ways of life for the sovereign Tribes who have inhabited and stewarded these lands since time immemorial.

Our organizations proposed designation of the Cascade River, Green River, and Napeequa River as Outstanding Resource Waters (ORWs) under WAC 173-201A during the 2021 Triennial Review. After an extensive public outreach and engagement process, at the end of 2023, Ecology approved and designated all three rivers as the state's first set of Tier (III) A ORWs.

We are writing today in support of the Washington Department of Ecology's ongoing commitment to protect and preserve Washington's waters, including through the future designation of ORWs. We are pleased to see consideration and designation of ORWs included in the Workplan as one of the actions and projects the agency plans to prioritize during the next three years of work. As climate change, human development, and other stressors converge to exert extreme pressure on our ecosystems and natural resources, preventing additional degradation to these important freshwater systems through ORW protection is critical. Simultaneously, activating state-level statutory tools to safeguard local resources will bolster the state's overall resiliency and ability to withstand new and unexpected threats to freshwater systems.

Thank you for providing the opportunity to comment on the Workplan and for hosting both the March 13<sup>th</sup> informational webinar and the April 15<sup>th</sup> virtual public hearing. These forums are an effective means to educate the public on the array of programs and policies Ecology pursues in the interest of protecting waters and other critical areas of the state for multiple human and nonhuman uses, including through the designation of Outstanding Resource Waters.

Sincerely,

Sarah Dyrdaahl  
American Rivers

Tom O'Keefe  
American Whitewater

Molly Whitney  
Cascade Forest Conservancy

Brett Swift  
The Pew Charitable Trusts

Alexei Calambokidis  
Trout Unlimited

Tom Uniack  
Washington Wild

Jessica Helsley  
Wild Salmon Center