

**American Whitewater • Astral • Greater Bellingham Running Club • Hard Core Paddles  
Immersion Research • League of Northwest Whitewater Racers • Live To Play  
Lower Columbia Canoe Club • Methow Rafting • MiiR • NOLS Pacific Northwest  
Northwest Outdoor Center • Orion Expeditions, Inc. • Paddle Trails Canoe Club • Patagonia  
Spokane Canoe and Kayak Club • Spokane Mountaineers • Superfeet Worldwide • The Mountaineers  
Washington Climbers Coalition • Washington Trails Association • Washington Water Trails Association  
Winter Wildlands Alliance • Yakima River Runners**

February 6, 2023

Laura Watson, Director  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

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

Dear Director Watson:

The undersigned organizations and businesses represent members of the Outdoor Recreation community in Washington. Collectively, we represent thousands of members, year-round employees, seasonal guides, and citizens who are deeply invested in the health of our state's rivers. We write today in support of designating several river systems as Tier III(A) Outstanding Resource Waters pursuant to WAC 173-201A-330. Nominated rivers we support for designation include the Cascade River (Skagit County), Green River (Skamania and Lewis counties), and Napeequa River (Chelan County).

Our organizations and businesses support efforts to protect the ecologically, culturally, and recreationally important rivers, streams, and wetlands, in Washington State. These waterways provide a multitude of ecosystem services including clean drinking water for communities, habitat that is critical to health and abundance of fish and wildlife species, scenic beauty that is a defining attribute of our quality of life, and numerous recreational opportunities for residents and visitors including fishing, boating, hiking and camping. Outdoor recreation supports \$26.5 billion in annual expenditures and 264,000 jobs throughout Washington State.<sup>1</sup> In addition, our waterways serve as the foundation for supporting Tribal Treaty rights and lifeways.

Protecting unimpaired headwaters is critical to the health of our rivers and everything downstream. The Clean Water Act recognizes the unique value of waterways of exceptional water quality and provides an opportunity for states to identify waterways as Outstanding Resource Waters. The rivers being considered, the first for Washington State, represent outstanding state resources due to their extraordinary water quality, ecological, and recreational values. When a river is designated as Tier III(A) Outstanding Resource Waters, it needs to be maintained and protected from all degradation. Although Washington has an abundance of high-quality waters that are important to protect, to date Ecology has not designated any Outstanding Resource Waters. Other western states, including Oregon, Colorado, New Mexico, and Arizona have taken advantage of this opportunity under the Clean Water Act to protect priority river.

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<sup>1</sup> Mojica, J., Fletcher, A., 2020. Economic Analysis of Outdoor Recreation in Washington State, 2020 Update. Earth Economics. Tacoma, WA,  
<<https://rco.wa.gov/wp-content/uploads/2020/07/EconomicReportOutdoorRecreation2020.pdf>>.

The Cascade, Green and Napeequa rivers in Washington State all meet multiple regulatory criteria for Outstanding Resource Waters designation and are deserving of protection as Outstanding Resource Waters. All three of the river systems are pristine and located in protected areas; have both excellent water quality and regionally unique recreational value; and have statewide ecological significance. Designation of these river systems 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 appreciate that the Department of Ecology has prioritized Outstanding Resource Waters rulemakings for the Cascade, Green (Mount St. Helens), and Napeequa rivers and offer our strongest support to protect these high quality resources of statewide significance.

Sincerely,

Thomas O'Keefe, Pacific Northwest Stewardship Director, American Whitewater

Cooper Lambla, Creative Manager, Astral

Larry Lober, Director, Greater Bellingham Running Club

Mike Nash, Owner, Hard Core Paddles

Kara Weld, Vice President, Immersion Research

Jennie Goldberg, Director, League of Northwest Whitewater Racers

Paul Fish, Founder, Live To Play

William Gehr, Conservation Chair, Lower Columbia Canoe Club

Brandon Bertelsen, Owner, Methow Rafting

Devon Richardson, Giving & Sustainability Manager, MiiR

Paul Satzinger, Operations Manager, NOLS Pacific Northwest

John Meyer, Owner, Northwest Outdoor Center

James L. Moore, President, Orion Expeditions, Inc.

Jesse Swedlund, President, Paddle Trails Canoe Club

Keith Shattenkirk, Program Officer, Patagonia

Brian H. Durham, Access Chairperson, Spokane Canoe and Kayak Club

Gina Claeys, Conservation Chair, Spokane Mountaineers

Eric Hayes, CMO, Superfeet Worldwide

Betsy Robblee, Conservation & Advocacy Director, The Mountaineers

Matt Perkins, President, Washington Climbers Coalition

Andrea Imler, Advocacy Director, Washington Trails Association

Andree Hurley, Executive Director, Washington Water Trails Association

Hilary Eisen, Policy Director, Winter Wildlands Alliance

Michael Aquilino, President, Yakima River Runners