



Concise Explanatory Statement Chapter 173-201A WAC, Outstanding Resource Waters

Summary of Rulemaking and Response to Comments

Washington State Department of Ecology
Olympia, Washington

December 2023, Publication 23-10-047

Publication Information

This document is available on the Department of Ecology's website at:
<https://apps.ecology.wa.gov/publications/summarypages/2310047.html>

Contact Information

Water Quality Program

P.O. Box 47600

Olympia, WA 98504-7600

Phone: 360-407-6600

Website: [Washington State Department of Ecology](http://www.ecology.wa.gov)¹

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

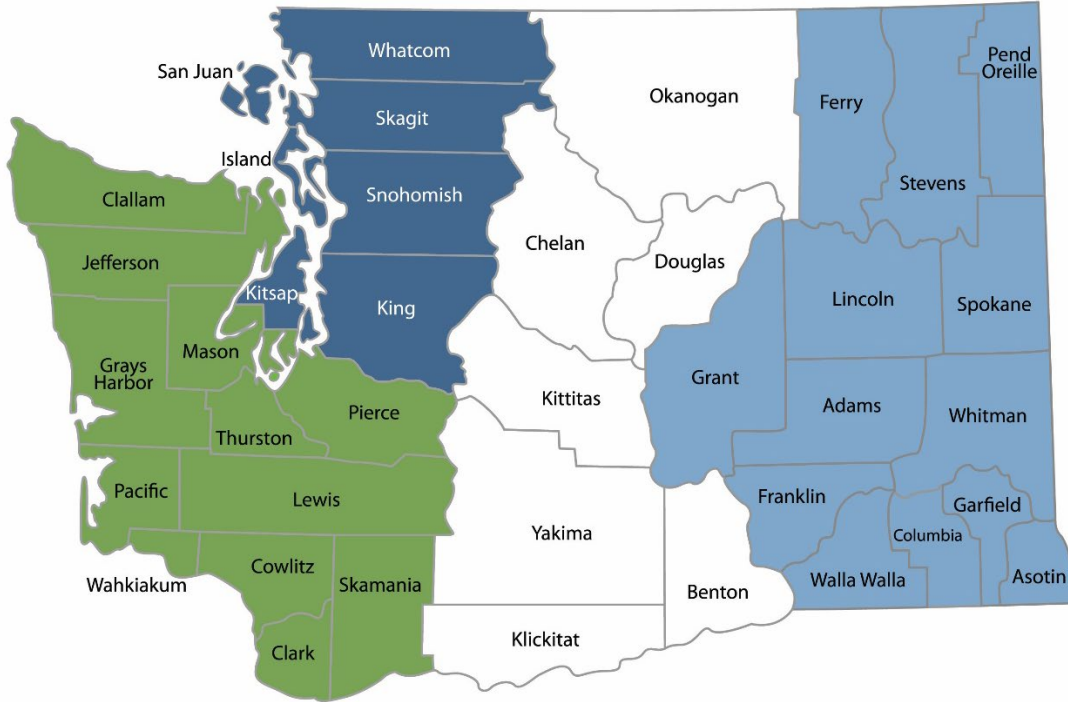
To request an ADA accommodation, contact Ecology by phone at 360-407-6600 or email at swqs@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility)² for more information.

¹ <http://www.ecology.wa.gov/contact>

² <https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
---	---	---------------------------------------	---------------------------------------

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Concise Explanatory Statement

Chapter 173-201A WAC Outstanding Resource Waters

Water Quality Program
Washington State Department of Ecology
Olympia, WA

December 2023 | Publication 23-10-047



DEPARTMENT OF
ECOLOGY
State of Washington

This page is purposely left blank

Table of Contents

Introduction	7
Reasons for Adopting the Rule	8
Differences Between the Proposed Rule and Adopted Rule	9
List of Commenters and Response to Comments	10
Organization of Comment Topics.....	10
List of commenters	10
Summarized Comments and Ecology Responses	11
Appendix A: Citation List	74
Appendix B List of Commenters	81
Appendix C List of Commenters under Section 1.1 Support Additional Protections	140
1.1.A Commenters	140
1.1.B Commenters	147

Introduction

The purpose of a Concise Explanatory Statement is to:

- Meet the Administrative Procedure Act (APA) requirements for agencies to prepare a Concise Explanatory Statement (RCW 34.05.325).
- Provide reasons for adopting the rule.
- Describe any differences between the proposed rule and the adopted rule.
- Provide Ecology’s response to public comments.

This Concise Explanatory Statement provides information on The Washington State Department of Ecology’s (Ecology) rule adoption for:

Title:	Water Quality Standards for Surface Waters of the State of Washington
WAC Chapter(s):	173-201A-WAC
Adopted date:	December 18, 2023
Effective date:	January 18, 2024

To see more information related to this rulemaking or other Ecology rulemakings please visit our website: <https://ecology.wa.gov/About-us/How-we-operate/Laws-rules-rulemaking>.

Reasons for Adopting the Rule

Washington State's antidegradation policy in WAC 173-201A-330 allows anyone to nominate a waterbody or portion of a waterbody as an outstanding resource water (ORW). A nomination must be submitted in writing and provide sufficient information to show how the waterbody meets at least one of the eligibility criteria listed under WAC 173-201A-330(1). Anyone can nominate a waterbody at any time.

If the Water Quality Program determines that the waterbody meets one or more of the eligibility criteria, we request approval from the Director of Ecology or their designee to schedule a rulemaking to review the nominated water for designation as an ORW. The review includes a public process and consultation with Tribes.

To decide whether to seek a rule to designate an outstanding resource water, we also consider factors relating to the difficulty of maintaining the current quality of the water body and the level of public support and affected governments. These considerations help Ecology evaluate the feasibility of the waterbody maintaining a high level of protection and how local support will lend to that protection.

Ecology received nominations to designate four waterbodies as ORWs. Portions of the Cascade River (Skagit County), Green River (Skamania County), and Napeequa River (Chelan County) were nominated in 2021 by Pew Charitable Trusts, American Rivers, Cascade Forest Conservancy, Wild Salmon Center, American Whitewater, Washington Wild, and Trout Unlimited. The designation boundary for each river is on federal land.

Soap Lake in Grant County was also nominated in 2021 by the Confederated Tribes of the Colville Reservation and the Soap Lake Conservancy.

Ecology collected information from local Tribes and stakeholders, the U.S. Forest Service, and the National Parks Service about priorities and implementation strategies for managing and protecting the high water quality and values for each nominated waterbody.

Ecology also met with local officials, including the Soap Lake City Council, the Skagit County Commissioners, the Skamania County Commissioners, Grant County Commissioners, and the Chelan County Natural Resources Director, to discuss implementation questions and concerns regarding these potential ORW designations. Based on the nominations, waterbody attributes, and stakeholder and local government outreach, Ecology decided to proceed with the proposed rule amendments to designate these waterbodies as ORWs.

Based on the strong level of support, we are adopting the following rule amendments:

- Designating portions of the Cascade, Green, and Napeequa rivers as Tier III(A) ORWs
- Designating Soap Lake as a Tier III(B) ORW

We are adopting these changes under a new section of chapter 173-201A WAC: 173-201A-332 Table 332—Outstanding resource water designations by water resource inventory area (WRIA).

Differences Between the Proposed Rule and Adopted Rule

RCW 34.05.325(6)(a)(ii) requires Ecology to describe the differences between the text of the proposed rule as published in the Washington State Register and the text of the rule as adopted, other than editing changes, stating the reasons for the differences.

There are some differences between the proposed rule filed on July 18, 2023, and the adopted rule filed on December 18, 2023. Ecology made these changes for all or some of the following reasons:

- In response to comments we received.
- To ensure clarity and consistency.
- To meet the intent of the authorizing statute.

The following content describes the changes and Ecology's reasons for making them.

We edited the Notes for Table 332 in WAC 173-201A-332, Table 332—Outstanding resource water designations by water resource inventory area (WRIA). Specifically, we made the following edits in response to a comment noting that based on our requirement to collect samples between April through October, this essentially constitutes a seasonal average, rather than an annual average:

Notes for Soap Lake:

- a. Soap Lake measurable change is defined as a decrease in salinity as measured by conductivity of 639 microsiemens per centimeter ($\mu\text{S}/\text{cm}$) or greater.
- b. In addition, human actions must not cause lake conductivity to decrease below 19,843 $\mu\text{S}/\text{cm}$ as calculated as a ~~an annual average~~ seasonal average more than once in 10 years.
- c. ~~Annual~~ Seasonal average conductivity is calculated as the arithmetic average of seven or more samples collected April through October. Sampling should be distributed throughout this period.

List of Commenters and Response to Comments

Organization of Comment Topics

We received a total of 2246 comment submissions on this rulemaking. Due to the high volume of comments, we have summarized comments when appropriate and responded to summarized comments. Commenters who provided a comment related to each topic below is listed after each comment. In some cases, we have provided a single response to more than one comment topic. Because of the high number of comments and the fact that the format of comment submissions varied widely, we are providing a [link to view all comments online](#)³.

1. General Support
2. Comments on Rulemaking Process
 - a. General comments on rulemaking process
 - b. Public involvement
 - c. Preliminary Regulatory Analysis (costs and benefits)
 - d. State Environmental Protection Act (SEPA)
3. Rule Proposal
 - a. Eligibility and baseline conditions
 - b. Designation boundary and maps
4. Implementation
 - a. General implementation comments
 - b. Permitting and authority
 - c. Impacts to forestry
 - d. Impacts to recreation
 - e. Impacts to roads, agriculture, and other land uses
 - f. Exempted activities
 - g. Future monitoring
5. Miscellaneous Comments
 - a. General Antidegradation Comments
 - b. Tier II vs Tier III
 - c. Future ORW proposals
 - d. Tier II ½
 - e. Incomplete or empty comments

List of commenters

Due to the high volume of commenters, we have included a table in Appendix B that contains a list of everyone who commented, and where to find a response to those comments. Some commenters may have commented on multiple topics.

³ <https://ws.ecology.commentinput.com/comment/extra?id=sUiNmjf5V>

Summarized Comments and Ecology Responses

1. General Support

1.1 Support Additional Protections

1.1.A Comment Summary – Commenters support additional protections for multiple ORWs and highlight benefits of an ORW designation, or provided information to support the eligibility for multiple waterbodies.

- We received a total of 682 comments for this topic. For better readability, the list of supporting commenters for this section can be found in Appendix C.

1.1.B Comment Summary – Commenters support additional protections for Soap Lake, or provided information to support the eligibility for Soap Lake.

- We received a total of 1280 comments for this topic. For better readability, the list of supporting commenters for this section can be found in Appendix C.

1.1.C Comment Summary - Commenters support additional protections for the Cascade River, or provided information to support the eligibility for the Cascade River.

- Akins, Judith
- Anderson, Ellen
- Bray, Martha
- Cunningham, Brenda
- Day, John
- DiLabio, Gena
- Dix, Teresa
- Faxon, Bee
- Gastellum, Carolyn
- Gordon, Heather
- Helm, Carla
- Holder, Mary Ruth & Phillip
- Holt, Alexander
- Kaye, Robert
- Keller, Donna
- Kirshenbaum, Mike (Skagit Land Trust)
- Kosa, Kim
- Lague, Rich
- Lindsay, Ron
- Link-New, Virgene
- Lloyd, Ralph
- Manns, Timothy (Skagit Audubon Society)
- Margulies, Mimi
- Mueller, Mark
- Samish Indian Nation (Todd Woodard)
- Sinker, Jeff
- Sinker, Mary
- Skinner, Ann
- Turner, Kent
- Upper Skagit Indian Tribe
- Walzer, Ben
- Washington Wild (Tom Uniack)
- Winkes, Ann

1.1.D Comment Summary – Commenters support additional protections for the Green River, or provided information to support the eligibility for the Green River.

- Alexander, Val
- Baller, Gretchen

- Buckley, Linda
- Byrne, Jim
- Chirman, Darlene
- Curtis, Richard
- Davern, Brian
- Dennison, Matthew
- Donehower, Christina
- Edge, Debbie
- Fort, Joetta
- Freeza, Roxie
- Gordon, Heather
- Haight, Ryan
- Hanisch-Kirkbride, Shauna
- Hawes, Eileen
- Hoyt, Spencer
- Herron, Lorena
- Hudson, Rosanne
- Kerr, Laurie
- Kremer, Ann
- Leatham, Ellen
- LeDuc Montgomery, Alicia
- Holder Jr., H. Lehman
- Mabie, Penny
- Mancill, Tony
- Mastin, Carolyn
- Morrison, Shelley
- Nyary, Bondi
- Parsons, Lisa
- Pennell, Dennis
- Ryan, Micky
- Saul, Susan
- Short, Ashley
- Siegel, Nancy
- Simmler, Todd
- Solomon, Laurie
- Thiede, Hanne
- Webster, Gary
- Wiederspan, Evan
- Wilcox, Jane
- Zahn, Andy
- Zahn, Laurien
- Zahn, Nancy

1.1.E Comment Summary – Commenters support additional protections for the Napeequa River or provided information to support the eligibility for the Napeequa River.

- Ballinger, Susan
- Gordon, Heather
- Korbolic, Chris
- Malone, Lindsay
- Uniack, Tom
- Wick, Dale
- Zanol, Jane

Response to 1.1.A-1.1.E

Thank you for your comments to support the ORW designations for the Cascade, Green, and Napeequa rivers, and Soap Lake.

In many cases, commenters submitted personal stories to provide their personal connection to one or more of the ORWs. We appreciate you sharing these stories.

2. Comments on the rulemaking process

2.1 General comments on rulemaking process

2.1.A Comment Summary – Commenters ask why Ecology is choosing this action.

- Sudar, Lisa

Response to 2.1.A

We are proposing designations in response to public nominations received in 2021. Each waterbody was formally nominated. Washington State’s antidegradation policy allows anyone to nominate a waterbody or portion of a waterbody as an ORW. A nomination must be submitted in writing and provide sufficient information to show how the waterbody meets at least one of the eligibility criteria listed under WAC 173-201A-330(1). Ecology has 60 days after receiving a nomination to determine if the information submitted meets the eligibility criteria.

We reviewed each nomination in 2021 and determined that each waterbody meets one or more of the eligibility criteria. During Washington’s 2021 Triennial Review, we received comment on behalf of 50 organizations in support of Ecology prioritizing a public review of the ORW nominations received.

We then requested approval from the Director of Ecology to schedule rulemaking for the nominated ORWs, which includes a public process and consultation with Tribes. During this review, we gathered and assessed information relevant to the waterbody’s eligibility as an ORW. We also discussed implementation questions and concerns with area landowners, state and local elected officials, state and federal agencies, and Tribes.

2.1.B Comment Summary – What is the timeline for Ecology to respond to a request?

- Skamania County Commissioners

Response to 2.1.B

We follow the process stated in WAC 173-201A-330(3), which states that "After receiving a request for ORW designation, the department will:

(a) Respond within sixty days of receipt with a decision on whether the submitted information demonstrates that the water body meets the eligibility requirements for an ORW. If the submitted information demonstrates that the water body meets the eligibility requirements, the department will schedule a review of the nominated water for designation as an ORW. The review will include a public process and consultation with recognized Tribes in the geographic vicinity of the water.

2.1.C Comment Summary - Can an ORW designation be reversed?

- Skamania County Commissioners

Response to 2.1.C

Ecology regularly reviews the surface water quality standards and updates them as needed based on public feedback, to reflect new science, or to be consistent with federal requirements. Changes to the Antidegradation Section of the surface water quality standards, in chapter 173-201A WAC, where the ORWs are listed, may be made if a need was identified and after a public process in accordance with the Washington State Administrative Procedures Act (Chapter 34.05 RCW).

2.1.D Comment Summary – Concerns about adopting designations without legislative approval

- Ballard, Brian
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Button, Nancy
- Champeaux, Tina
- Citizen Action Defense Fund (Jackson Maynard)
- Cowdrey, Lori
- Eidsness, Deborah KB
- Finch, Indra
- Frey, Donald
- Gromlich, Rebecca
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hennig, Jason
- Hogeweide, Ted
- Knight, Mary
- Knudsen, Elizabeth
- Leavitt, Mike
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- MacPherson, Darcy
- Manning, Carter
- Meier, Robert
- Miller, James
- Mitchell, Cindy (Washington Forest Protection Association)/WFPA
- Nielsen, David
- Nyborg, Julie
- O'Haegher, Kyra
- Rayonier (Holli Johnson)
- Rohrbach, Eric
- Saltvick, Brian
- Smithing, Robert
- Stienbarger, Doug
- Strom, Eric
- Sudar, Lisa
- Underwood Ranch LLC (Kurt Underwood)
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to 2.1.D

We carefully weigh the level of support from the public and affected governments in assessing whether to designate a water as an ORW. The Washington State Legislature enacted Chapter 90.48.260 Revised Code of Washington (RCW) to delegate Ecology the responsibility to implement Clean Water Act requirements, which include designating ORWs under the Antidegradation Section of the surface water quality standards, in chapter 173-201A WAC. The Water Pollution Control Act (Chapter 90.48 RCW) does not require the legislature to review or approve changes to the surface water quality standards. Updating the surface water quality

standards, including designating any ORWs, is a significant agency action, and as such we are required to go through a formal rulemaking process in accordance with the Washington State Administrative Procedures Act (Chapter 34.05 RCW).

2.1.E Comment Summary – Proposal is rushed through the process without support from Skagit County community. Our county representatives are in opposition to the proposed designation and further action on the proposal should be postponed. The proponents of the designation are from special interest groups with focused objectives that do not represent the diverse local population.

- Chamberlain, Dave

2.1.F Comment Summary – Concerns about lack of demonstrated public support or that we need to consider public comments

- American Forest Resource Council (Matt Comisky)
- Ballard, Brian
- Bare, Bruce
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Button, Nancy
- Chamberlain, Dave
- Champeaux, Tina
- Citizen Action Defense Fund
- Cowdrey, Lori
- Eidsness, Deborah KB
- Finch, Indra
- Frey, Donald
- Gromlich, Rebecca
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hennig, Jason
- Hogeweide, Ted
- Knight, Mary
- Knudsen, Elizabeth
- Leavitt, Mike
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- MacPherson, Darcy
- Manning, Carter
- Meier, Robert
- Miller, James
- Mitchell, Cindy (Washington Forest Protection Association)/WFPA
- Nielsen, David
- Nyborg, Julie
- O'Haegher, Kyra
- Rayonier (Holli Johnson)
- Rohrbach, Eric
- Saltvick, Brian
- Smithing, Robert
- Stienbarger, Doug
- Strom, Eric
- Sudar, Lisa
- Underwood Ranch LLC (Kurt Underwood)
- Washington Forest Protection Association (Darin Cramer)
- Witter, Patricia Lee
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to 2.1.E-2.1.F

We do not consider the ORW rulemaking a rushed process. Starting in 2021, we spent two and a half years conducting extensive outreach to connect with the communities that could be affected by this rulemaking. Once we received the nominations, we contacted the affected federal agencies in addition to local elected officials. During the nomination and formal rulemaking process, we met with affected federal agencies multiple times and presented to local elected officials, including county commissioners, within the jurisdiction of each of the four waterbodies.

Further, before submitting a nomination to Ecology, the proponents of the Cascade, Green, and Napeequa River ORWs reached out to local elected officials, Tribes, and landowners to gauge the level of public support. While not required for nomination, we asked the proponents provide to Ecology any information they have on a base level of support before submitting a nomination to Ecology.

In reviewing any ORW nomination, we consider the level of public support and affected governments when determining whether to adopt this protection. Based on our review of the public comments, we have noted significant public support for the designations. We have received support from Tribes, and numerous businesses and groups within each region of the ORWs and statewide. A summary of support we received for each ORW is provided below.

Comments in support of the Cascade, Green, and Napeequa Rivers together

- 60 businesses signed WA Wild letter
- 18 Organizations and businesses representing the outdoor recreation community in WA
- 4 angling and hunting organizations
- WA Native Plant Society
- Nature Conservancy in WA
- Audubon Society
- Conservation Northwest
- Western Washington University Professor
- 682 individual submissions

Cascade

- Samish Indian Nation
- Upper Skagit Tribe of Indians
- 53 businesses signed Cascade River local stakeholder support letter
 - Includes support from 10th Legislative District (Reps. Paul and Shavers) and 40th District (Sen. Lovelett, and Reps. Ramel and Lekanoff)
 - Includes support from local elected officials in cities of Anacortes, Bellingham, Blaine, La Connor, Mount Vernon, and Sedro-Woolley
- Whatcom County Democrats
- North Cascades Audubon Society
- 26 individual comments in support specifically of the Cascade River

Green River

- Cowlitz Indian Tribe
- 21 Organizations representing conservation and civic groups
- Vancouver Audubon Society
- Lower Columbia Fish Enhancement Group
- Definitely Mabie Consulting
- Talking Rocks Outdoor Company
- 46 comments in support specifically for the Green River

Napeequa River

- 10 organizations representing local stakeholders in Chelan, Kittitas, and Yakima counties
- 7 individual comments in support specifically for the Napeequa River

Soap Lake

- Soap Lake Conservancy (co-proponent)
- Soap Lake Natural Spa and Resort
- Natural Medicine
- McKay Healthcare and Rehab
- City of Soap Lake Mayor Agliano
- Coulee Corridor Consortium
- Lower Grand Coulee Chapter of the Ice Age Floods Institute
- Cemvita
- L.I.G.H.T. Foundation
- 1,280 individuals in support

2.1.G Comment Summary – Comments stating that existing protections are enough, or it is unclear why an ORW designation is needed, or asking what the problem this rulemaking is addressing.

- American Forest Resource Council (Matt Comisky)
- Assoc. of Consulting Foresters
- B, J
- Ballard, Brian
- Bonagofsky, Jerry
- Button, Nancy
- Bynum, Ellen
- Cowdrey, Lori
- Dunham, Judith
- Eidsness, Deborah KB
- Finch, Indra
- Frey, Donald
- Gromlich, Rebecca
- Hampton Lumber
- Hanson, Richard
- Hayden, Larry
- Hennig, Jason
- Hillery, Jamie
- Hogeweide, Ted
- Iverson, Gordon
- Kittitas County
- Knudsen, Elizabeth
- Leavitt, Mike
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- MacPherson, Darcy
- Miller, James
- Mitchell, Jessica
- Nyborg, Julie
- O’Haegher, Kyra
- Pierce County Council (Amy Cruver)

- Rayonier (Holli Johnson)
- Saltvick, Brian
- Scott Grigg
- Sierra Pacific Industries (John Gold)
- Skagit County Commissioners
- Smith, Shon, Chelan County Commissioner District 2
- Smithing, Robert
- Stargell, Aubrey
- The Molpus Woodlands Group, LLC
- Underwood Ranch LLC (Kurt Underwood)
- Wagoner, Keith (State Senator)
- Washington Forest Protection Association (Darin Cramer)
- Westergreen, Tom
- WFPA, (Mitchell, Cindy)
- Wood, Glen
- Woods, Cheryl
- Woods, Mik

2.1.H Comment Summary - What is the practical purpose and function of the Napeequa River ORW status given its location in the Glacier Peak Wilderness? Ecology and the proponents appear to be concerned that the wilderness protections afforded by the Glacier Peak Wilderness will somehow be lifted or removed, which would then leave ORW rules as the backstop for Napeequa water quality protections. It seems far-fetched to us that the Glacier Peak Wilderness will be undone by Congress, and even if it were undone, federal land use designations administered by the US Forest Service would still provide the highest levels of water quality protections.

- Chelan County

Response to 2.1.G-2.1.H

The goal of an ORW designation is to protect a waterbody from future sources of degradation so that the current quality of the water is maintained well into the future. The aim is not to fix a demonstrated water quality problem, rather to prevent future sources of pollution from affecting our most valued state waters.

Many of the existing protections in place for the Cascade, Green, and Napeequa rivers are in fact what make these rivers eligible for designation as an ORW and contribute to the relatively pristine qualities. The surface water quality standards describes eligible waterbodies that are in “relatively pristine condition (largely absent from human sources of degradation) or possesses exceptional water quality, and also occurs in federal and state parks, monuments, preserves, wildlife refuges, wilderness areas, marine sanctuaries, estuarine research reserves, or wild and scenic rivers” ([WAC 173-201A-330\(1\)\(a\)](#)).

For example, the Cascade River is a critical tributary to the Skagit River system - this is one of the most significant watersheds for salmon and salmon recovery. The ongoing restoration work in the area relies on cool, clean headwaters in the Cascade River for decades to come for the overall success of salmon recovery in the Skagit.

Protecting the headwaters for the Napeequa River is critical to addressing climate impacts, for salmon recovery, and the overall economic well-being of our state. It is easier and more cost efficient to protect pristine areas from degradation, rather than spend millions (and decades) to restore habitat.

We agree with the commenter that stated many land use restrictions within the Glacier Peak Wilderness area are already in place to protect the values of the wilderness area. However, we disagree that even without the wilderness protection, "federal land use designations administered by the US Forest Service would still provide the highest levels of water quality protections." ORWs are a state-designated level of water quality protection, and states are given this authority to protect our highest valued waters through an administrative process. Prior to this rulemaking, no waterbody in Washington had been provided this designation from the state.

We have updated our [Technical Support Document](#) to clarify the added protections an ORW designation provides, compared to existing protections through a Wild and Scenic River designation and wilderness area designation.

2.1.I Comment Summary – WAC 173-201A-330(3) states that "After receiving a request for outstanding resource water designation, the department will: ... (b) In determining whether or not to designate an outstanding resource water, the department will consider factors relating to the difficulty of maintaining the current quality of the water body (emphasis added)". There is no indication that WDOE would find difficulty maintaining current water quality. As stated above, regulations already exist which identify higher environmental qualities occur and limit actions.

- Skagit County Commissioners (Cascade River)

Response to 2.1.I

We agree with the comment that current protections identify higher environmental qualities and limit actions that would cause more considerable degradation. These protections contribute to the relatively pristine condition of the Cascade River within the proposed ORW boundary, and to our conclusion that as such, the Cascade River meets the condition under WAC 173-201A-330(1)(a). With such existing protections and lack of pollution sources in the watershed, Ecology does not anticipate any factors that would indicate difficulty in maintaining the current quality of water with an ORW designation level.

2.1.J Comment Summary – Request to postpone or stop rulemaking or extend public comment period.

- American Forest Resource Council (Matt Comisky)
- Anonymous
- Antush, Philip
- B, J
- Ballard, Brian
- Bare, Bruce
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Burgess, Bill (Napeequa River)
- Button, Nancy
- Byars, Patricia
- Bynum, Ellen
- Chamberlain, Dave
- Chelan County
- Cowdrey, Lori
- Dills, Quentin
- Double O Ranch (Kleinhuizen, Cindy)
- Eidsness, Deborah KB
- Finch, Indra

- Franett, Pete (Green River)
- Frey, Donald
- Fry, Blade
- Good, Randy and Aileen
- Gordon, David
- Grant County Commissioner
- Grigg, Scott
- Gromlich, Rebecca
- Hampton Lumber
- Hampton Lumber
- Hanson, Richard
- Hayden, Nathaniel
- Hennig, Jason
- Herke-Canterbury, Marilyn
- Hogweide, Ted
- Jackson, Delvina
- Janicki, Peter
- Iverson, Gordon
- Ketcham, Terry W.
- Kittitas County (Cory Wright)
- Knudsen, Elizabeth
- Leavitt, Mike
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- MacPherson, Darcy
- Mallon, Christine
- Manning, Carter
- Meek, Josh
- Miller, James
- Mitchell, Cindy/WFPA
- Murray, Joseph
- Nielsen, David
- Nyborg, Julie
- O'Haegher, Kyra
- O'Neill Pine Company
- Pierce County Council (Amy Cruver)
- Rayonier (Holli Johnson)
- Rohrbach, Eric
- Saltvick, Brian
- Skamania County Board of Commissioners
- Smithing, Robert
- Stienbarger, Doug
- Strom, Eric
- Sudar, Lisa
- The Molpus Woodlands Group, LLC
- Thompson, Gayle
- Underwood Ranch LLC (Kurt Underwood)
- Verbarendse, Krysta
- Verbarendse, Steve
- Washington Forest Protection Association (Darin Cramer)
- Western Washington Agricultural Association (Kara Rowe)
- Whitmore, Richard
- Wilson, Howard
- Witter, Patricia Lee
- Wolf, Deanna
- Wood, Glen
- Woods, Cheryl
- Woods, Mike
- Xaver, Andrea

Response to 2.1.J

Ecology considered the requests to extend the public comment period until January 2024 and decided an extension is not appropriate given the length of the public comment period (72 days), the five public hearings provided for questions and testimony, and extensive outreach to communicate the rule proposal. While we understand that some noted the lack of time to evaluate the rule proposal due to staffing shortages and dealing with many conflicting priorities, we also must ensure we are providing adequate time for public review while completing our rulemaking commitments in a timely manner.

We also determined that a pause of this rulemaking is not necessary or appropriate. Ecology has provided a thorough analysis of the impacts and results of this rulemaking including extensive outreach to interested parties and response to comments. Ecology has a responsibility to follow through with the rules to designate Tier III ORW waters and respond to nominations in a timely manner within the timelines provided for in Washington’s Administrative Procedures Act. We are available to schedule a meeting to discuss Tier III protections if we receive those specific requests.

2.1.K Comment Summary – Comments requesting more information on impact of rulemaking to areas outside the ORW designations or requesting an impact analysis of ORW designation for waterbodies that have not been nominated.

- Pierce County Council (Amy Cruver)
- Kittitas County
- Chelan County (Kaputa, Mike)

Response to 2.1.K

It is beyond the scope of this rulemaking to provide information on the impacts of an ORW designation to an area where we are not proposing any designation changes. We provided that communication with this rule effort even though the rivers nominated were primarily in federal land.

We are available to schedule a meeting to discuss Tier III protections if we receive those specific requests. Local elected officials can be assured that if Ecology does receive a nomination to designate a waterbody within their county, the county should expect communication that is both early and often.

2.2 Public Involvement

2.2.A Comment Summary – Commenters noted a lack of notification and communication with the public, Tribes, and federal landowners, or promoting a recommendation without public review.

- American Forest Resource Council (Matt Comisky)
- Bare, Bruce
- Boyd, Wade
- Bynum, Ellen
- Finnegan, LEO
- Good, Randy and Aileen
- Grant County Commissioners (Danny Stone) (Soap Lake)
- Hayden, Larry (Green)
- Humann, Chris
- Kittitas County (Cory Wright)
- Miller, Ken and Bonnie
- Mitchell, Jessica
- Mitchem, Darcy
- Oliver, Norman
- Pierce County Council (Amy Cruver)
- Skagit County Farm Bureau (William Schmidt)
- Skamania County Board of Commissioners (Green River)
- Smithing, Robert

- Sweeney, Brian
- Verbarendse, Krysta
- Verbarendse, Steve
- Washington Forest Protection Association (Darin Cramer)
- Worlock, Dylan

Response to 2.2.A

Over the past two and a half years, we've conducted extensive outreach to connect with the communities and interested parties that could be affected by this rulemaking.

Upon receiving the nominations in 2021, Ecology notified Tribes, state representatives, county commissioners, Soap Lake Mayor and City Council, Bureau of Recreation, Quincy-Columbia Basin Irrigation District. We also communicated directly with affected landowners.

During our 2021 Triennial Review public process, we asked for public feedback on whether we should pursue formal rulemaking to consider designating the nominated ORWs. The Triennial Review is a public process that helps inform and prioritize our plans to revise the surface water quality standards. We took public comment July to September 2021 on our proposed workplan for projects that we would prioritize between 2022 and 2024. We received a comment letter signed by 50 organizations in support of prioritizing an ORW rulemaking for the Cascade, Green, and Napeequa rivers.

Once we formally began the rulemaking process in August 2022, we held two introductory public webinars in November 2022 to provide background information on why we are doing the rulemaking and to gather questions on implementation. Between November 2022 and June 2023, we presented at several public forums (the Skagit County Board of Commissioners, Grant County Board of Commissioners, and Skamania County Board of Commissioners) to provide information on the rulemaking and answer questions. We also met individually with one Skamania County Commissioner to discuss the Green River and the Chelan County Natural Resources Director to discuss the Napeequa River.

For Soap Lake, we presented in a public forum to the Soap Lake City Council. We also met multiple times with the Bureau of Reclamation and the Quincy-Columbia Irrigation District to understand the irrigation activity in the region and the Soap Lake Protective Works.

Ecology also met several times with Forest Service staff in the areas for each of the three rivers, starting in 2021. We also discussed the rule with National Parks Service Staff.

Ecology regularly meets with tribal water quality staff across Washington and presented information on this rulemaking during two meetings: fall 2022 and spring 2023. Over 20 Tribes and tribal organizations were present. In addition, we notified tribal chairs and natural resource directors when we received the nominations, when we began the rulemaking, and when we began the public comment period.

We promoted our public comment period and public hearings on the draft rule (July-September 2023) through many channels: a press release, our webpage, emails to several mailing lists, advertisements in both newspapers and Facebook, social media posts, and physical flyers in

communities near proposed waterbodies. We held one virtual public hearing and four in-person hearings (one near each of the proposed ORWs).

We understand that even though ORW designations have been possible for decades and the details to nominate an ORW for protection was revised in the surface water quality standards in 2003, this is the first time many are learning about Tier III waterbody protection. That is one of the key reasons why Ecology conducted such extensive statewide outreach and specific effort to connect with the local communities that could be affected by this rulemaking.

2.2.B Comment Summary – Commenters asked if private landowners within the designation boundary were notified.

- Faubion, Andy
- French, Kerry
- Hayden, Larry (Green River)
- Maahs, Kathy
- Oakes, Angeles

Response to 2.2.B

Private landowners for Soap Lake and the Cascade River were notified by direct paper mailings. No private landowners are within the Napeequa River or Green River ORW boundaries. We also promoted our public comment period and public hearings on the draft rule (July-September 2023) in several ways: a press release, our webpage, emails to several mailing lists, advertisements in both newspapers and Facebook, social media posts, and physical flyers in communities near proposed waterbodies.

2.2.C Comment Summary – Commenter requests the specific names and/or positions, titles, and dates of the various interactions with US Forest Service representatives.

- American Forest Resource Council (Matt Comisky)

Response to 2.2.C

Ecology met with the Forest Service on the following dates:

August 11, 2021

- Watershed Program Manager, Gifford Pinchot National Forest
- Hydrologist, Mt. Baker-Snoqualmie National Forest
- Watershed Program Manager, Okanogan-Wenatchee National Forest
- Ranger, Mount St. Helens National Monument
- Regional Water Quality and Water Resources Program Manager, Region 6
- Deputy Forest Supervisor, Okanogan-Wenatchee National Forest
- Acting Assistant Director, Okanogan-Wenatchee National Forest

July 14, 2022

- Regional Water Quality and Water Resources Program Manager, Region 6 (Acting)
- Watershed Program Manager, Gifford Pinchot National Forest
- Ranger, Mount St. Helens National Monument
- Watershed Program Manager, Okanogan-Wenatchee National Forest

Jan. 10, 2023

- Fisheries Biologist, Cowlitz Valley Ranger District
- Hydrotechnician, Water Quality Monitoring, Cowlitz Valley Ranger District

In addition to these direct meetings, Ecology maintained email communication with Forest Service staff throughout the process of this rulemaking.

2.2.D Comment Summary - Commenters requested Ecology gives the public clear and direct information about how it is making the designations, costs, and implications for local communities. Commenters stated that Ecology did not provide a transparent, objective, or robust analysis, or state that Ecology's standards for designating Tier III waters are vague and subjective.

- Assoc. of Consulting Foresters
- American Forest Resource Council (Matt Comisky)
- B, J
- Ballard, Brian
- Board of Clallam County Commissioners (Randy Johnson)
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Bubelis, Wally
- Button, Nancy
- Bynum, Ellen
- Champeaux, Tina
- Citizen Action Defense Fund
- Cowdrey, Lori
- Devnich, Jan
- Eidsness, Deborah KB
- Finch, Indra
- Finnegan, LEO
- Frey, Donald
- Good, Randy Good and Aileen Good
- Hammons, Dee
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hayden, Larry
- Hennig, Jason
- Hogeweide, Ted
- Humann, Chris
- Jones, Deb
- Ketcham, Terry W.
- Kittitas County (Cory Wright)
- Knudsen, Elizabeth
- Kollasch, Mark
- Leavitt, Mike
- Leggett, BJ
- M Long, Teresa
- MacPherson, Darcy
- Manning, Carter

- Miller, James
- Miller, Ken and Bonnie
- Mitchell, Jessica
- Mitchem, Darcy
- Nielsen, David
- Nyborg, Julie
- Oakes, Angeles
- O'Haegher, Kyra
- Oliver, Norman
- O'Neill Pine Company (Richard Pine)
- Pierce County Council (Amy Cluver)
- Rayonier (Holli Johnson)
- Roberts, Dave
- Rohrbach, Eric
- Saltvick, Brian
- Saxton's Timber Farm and Sanctuary, LLC (Darrell Saxton)
- Skagit County Farm Bureau (William Schmidt)
- Skamania County Board of Commissioners
- Smithing, Robert
- Stienbarger, Doug
- Strom, Eric
- Sudar, Lisa
- Sweeney, Brian
- The Molpus Woodlands Group, LLC (Ruth Cook)
- Underwood Ranch LLC (Kurt Underwood)
- Verbarendse, Krysta
- Washington Forest Protection Association (Darin Cramer)
- Wood, Glen
- Woods, Cheryl
- Woods, Mike
- Worlock, Dylan

Response to 2.2.D

Ecology follows the process outlined in WAC 173-201A-330 when considering designating ORWs. Ecology provided the following information for public review during the public comment period on how we are making the designations, the costs, and the implications for local communities:

- Draft [Technical Support Document](#) outlines how we evaluated each waterbody for eligibility and includes detailed maps of each of the proposed ORWs and information on existing land uses, existing protections, and water quality.
- [Preliminary Regulatory Analyses](#) presents information on the likely costs, benefits, and impacts to local communities.
- Draft [Implementation Plan](#) present how Ecology would implement the rule.

All documents were made available for review and public comment during our public comment period, held July – September 2023. We presented this information during each of our five public hearings held in September 2023.

The sections within this document on the Preliminary Regulatory Analyses and Implementation provide more answers to specific questions on these topics.

2.2.E Comment Summary – Commenter noted that Ecology’s schedule did not allow for this issue to be presented to the WSAC [Washington State Association of Counties] Timber Counties Caucus to address how these counties may be impacted.

- Skamania County Board of Commissioners (Green)

Response to 2.2.E

We would have been honored to present at the WSAC Timber Counties Caucus in Ellensburg on September 20. However, the request for our attendance came after we had already published notice that we were holding a public hearing in Leavenworth on that same day to provide the public the opportunity to learn about and comment on the proposed rule.

However, we appreciated the opportunity on four separate occasions to speak with county commissioners in each of the four counties where we are proposing ORW protections, including the Skagit County Board of Commissioners on Nov. 22, 2022, Skamania County Commissioner Leckie on April 13, 2023, Skamania County Board of Commissioners on May 31, 2023, and the Grant County Board of Commissioners on June 6, 2023. We also appreciated the opportunity to speak with the Chelan County Natural Resources Director on April 18, 2023, who met with us on behalf of the Chelan County Commissioners.

WSAC Timber Counties Caucus can request Ecology to present on ORWs at a future meeting, but we do not think it is appropriate to delay the current rulemaking for a more general discussion beyond what was already provided to commissioners in the areas directly involved with this rulemaking.

2.3 Preliminary Regulatory Analyses

2.3.A Comment Summary – Comments stating concerns about the economic impacts of the rule. Some specific concerns on impacts include on adjacent communities, the square miles affected, land and road management activities, the production of raw materials from resource lands, rural employment and economies, forest practices, private property, and recreation, and appropriate mitigation of those impacts.

- American Forest Resource Council (Matt Comisky)
- Ballard, Brian
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Button, Nancy
- Cowdrey, Lori
- Double O Ranch (Kleinhuizen, Cindy)
- Eidsness, Deborah KB
- Finch, Indra
- Frey, Donald
- Gromlich, Rebecca
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hayden, Nathaniel
- Hennig, Jason
- Hogeweide, Ted
- Ketcham, Terry W.
- Knudsen, Elizabeth
- Leggett, BJ
- Lund, Traci

- M Long, Teresa
- MacPherson, Darcy
- Manning, Carter
- Miller, James
- Mitchell, Cindy/WFPA
- Murray, Joseph
- Nielsen, David
- Nyborg, Julie
- O'Haegher, Kyra
- Pierce County Council (Amy Cruver)
- Rayonier (Holli Johnson)
- Rohrbach, Eric
- Saltvick, Brian
- Sierra Pacific Industries (John Gold)
- Skagit County Farm Bureau (William Schmidt)
- Skamania County Board of Commissioners
- Smithing, Robert
- Stienbarger, Doug
- Strom, Eric
- The Molpus Woodlands Group, LLC
- Underwood Ranch LLC (Kurt Underwood)
- Verbarendse, Krysta
- Verbarendse, Steve
- Washington Forest Protection Association (Darin Cramer)
- Wilson, Howard
- Winslow, Robert
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to 2.3.A

Our Preliminary Regulatory Analyses (PRA) reviews the potential qualitative and quantitative costs and benefits of the proposed designations. The PRA notes that "We did not identify immediate or likely future impacts associated with the proposed rule amendments, as implementation of baseline laws and rules is likely to be protective of the proposed ORW-designated waters under likely current and future circumstances. We base this determination on current activities identified for each waterbody and surrounding lands, in conjunction with existing permitting requirements, federal and state laws and rules, and local regulations." (PRA, pg. 12).

The PRA further notes that "[t]he proposed rule amendments could affect activities in unlikely or unforeseen circumstances if baseline requirements are not sufficiently protective of the outstanding qualities of the proposed ORW-designated waterbodies. Such circumstances could include:

- Activities that create runoff to proposed ORW-designated rivers, of substances not covered by baseline water quality or land use regulations and permit requirements, where runoff is not mitigated by actions otherwise required in permit.
- Changes to baseline requirements at the federal level, affecting management of federal lands and associated environmental protections.

In the exceptional circumstances listed above, the proposed rule amendments could result in a permittee being required to do additional monitoring for permitted activities. They could also result in:

- An Ecology investigation of degradation sources under the baseline requirements and procedures to identify potential human causes.

- Technical assistance in compliance." (PRA, pg. 12-13)

Based on this information, an ORW designation would not result in an entire watershed being closed nor current activities limited as long as existing laws and regulations to protect water quality are followed.

The ultimate impacts of the exceptional circumstances and potential responses above depend on the results of investigation, including potential human causes. It is only in cases where human causes were identified and additional compliance activities (costs) were necessary, that additional protection of environmental or human health values (benefits) would occur. While we do not believe these circumstances are likely, given baseline regulations, we have added illustrative scenarios to the Final Regulatory Analyses for this rulemaking to provide examples of costs and benefits that could result from the rule in the unlikely circumstances above.

Further, we cannot and are not required to provide an estimate of the square miles affected by any of the proposed ORW designations. Ecology cannot anticipate future potential land actions that may or may not be affected by a designation, so it would be misleading to estimate the square miles affected by a designation. Some activities may still occur if they do not result in more than a temporary lowering of water quality.

2.3.B Comment Summary – Commenters asked if Ecology has considered future potential need for energy efficient resources potentially present within the proposed ORW designation boundary or potential economic impacts or legal implications if mining activity for those resources cannot occur because of an ORW designation.

- American Exploration & Mining Association (Green)
- Faubion, Andy
- French, Kerry (Green)
- Hayden, Larry (Green)
- Maahs, Kathy

Response to 2.3.B

We identified that energy efficient resources (existing or with potential to be demanded in the future) are not likely to be impacted by the rule as compared to the regulatory baseline. The PRA notes that "The proposed rule amendments could affect activities in unlikely or unforeseen circumstances if baseline requirements are not sufficiently protective of the outstanding qualities of the proposed ORW-designated waterbodies. Such circumstances could include:

- Activities that create runoff to proposed ORW-designated rivers, of substances not covered by baseline water quality or land use regulations and permit requirements, where runoff is not mitigated by actions otherwise required in permit.
- Changes to baseline requirements at the federal level, affecting management of federal lands and associated environmental protections.

In the exceptional circumstances listed above, the proposed rule amendments could result in a permittee being required to do additional monitoring for permitted activities. They could also result in:

- An Ecology investigation of degradation sources under the baseline requirements and procedures to identify potential human causes.
- Technical assistance in compliance." (PRA, pg. 12-13)

While it is not clear to which energy-efficient resources the commenters are referring:

- Hydroelectric development is limited under the baseline, by designation as a Wild and Scenic River or explicit designation as protected from hydroelectric development.
- In the exceptional circumstances in which the rule is more protective than the baseline, we would depend on the results of investigation, including potential human causes. It is only in cases where human causes were identified and additional compliance activities (costs) were necessary, that additional protection of environmental or human health values (benefits) would occur. While we do not believe these circumstances are likely, given baseline regulations, we have added illustrative scenarios to the Final Regulatory Analyses for this rulemaking to provide examples of costs and benefits that could result from the rule in the unlikely circumstances above. These include a forestry scenario.
- We further assessed the likelihood and potential impacts of future mineral rights and development that may be related to energy-efficient technology resource needs (e.g., copper) in Appendix B of the Regulatory Analyses. Regarding potential future demand for resources that have not been identified as viable and allowable under existing baseline regulation, we do not expect aggregate supply of mineral resources available for energy-efficient technologies to be significantly impacted by additional compliance costs at potential future projects within ORWs.

2.3.C Comment Summary – Ecology’s PRA could not quantify the degree to which the designation would improve water quality, increase recreational visits, or increase fish and wildlife populations.

- | | |
|---|-----------------------------------|
| • Bonagofsky, Jerry | • Hennig, Jason |
| • Hampton Lumber (Douglas Cooper) | • Hogeweide, Ted |
| • Underwood Ranch LLC (Kurt Underwood) | • Ketcham, Terry W. (Cascade) |
| • Washington Forest Protection Association (Darin Cramer) | • Knudsen, Elizabeth |
| • Ballard, Brian | • Leggett, Bj |
| • Button, Nancy | • Lund, Traci |
| • Cowdrey, Lori | • M Long, Teresa |
| • Eidsness, Deborah Kb | • Macpherson, Darcy |
| • Finch, Indra | • Miller, James |
| • Frey, Donald | • Nyborg, Julie |
| • Hanson, Richard | • O'haegher, Kyra |
| | • Saltvick, Brian |
| | • The Molpus Woodlands Group, LLC |

- Verbarendse, Krysta
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

2.3.D Comment Summary - Has the DOE considered the costs of maintenance, parking, and toilet facilities as recreational uses increase? Who would be responsible for these costs? Is the DOE aware of what the DNR is going through due to increases in recreational uses? Are they willing to do the same to offset any impacts from their decision to designate the Cascade as a Tier III water for its recreational uses?

- Faubion, Andy
- French, Kerry (Green)
- Hayden, Larry (Green)
- Maahs, Kathy

2.3.E Comment Summary – Ecology does not explain what resources are inadequately protected under current designation and therefore what the need for the proposed rule is. We are concerned that without explicit identification and analysis, WDOEs determination that benefits of the proposed rule exceed the costs is arbitrary and would fail the requirement to select the least burdensome alternative.

- Sierra Pacific Industries (John Gold)

Response to 2.3.C-2.3.E

The goal of an ORW designation is to protect a waterbody from future sources of degradation so that the current quality of the water is maintained well into the future. The aim is not to fix a demonstrated water quality problem, rather to prevent sources of pollution from affecting our most valued state waters. Nor is the aim to increase recreational visits to a waterbody. Rather, by protecting the water quality of a waterbody that has demonstrated unique recreational value, the designation would support the continued valued uses of that water.

The PRA notes that "The proposed rule amendments could affect activities in unlikely or unforeseen circumstances if baseline requirements are not sufficiently protective of the outstanding qualities of the proposed ORW-designated waterbodies. Such circumstances could include:

- Activities that create runoff to proposed ORW-designated rivers, of substances not covered by baseline water quality or land use regulations and permit requirements, where runoff is not mitigated by actions otherwise required in permit.
- Changes to baseline requirements at the federal level, affecting management of federal lands and associated environmental protections.

In the exceptional circumstances listed above, the proposed rule amendments could result in a permittee being required to do additional monitoring for permitted activities. They could also result in:

- An Ecology investigation of degradation sources under the baseline requirements and procedures to identify potential human causes.
- Technical assistance in compliance.” (PRA, pg. 12-13)

The ultimate impacts of the exceptional circumstances and potential responses above depend on the results of investigation, including potential human causes. It is only in cases where human causes were identified and additional compliance activities (costs) were necessary, that additional protection of environmental or human health values (benefits) would occur. While we do not believe these circumstances are likely, given baseline regulations, we have added illustrative scenarios to the Final Regulatory Analyses for this rulemaking to provide examples of costs and benefits that could result from the rule in the unlikely circumstances above.

Based on our assessment of the regulatory baseline, including environmental and health protection requirements for construction, maintenance, and toilet facilities, exogenous increases in recreational use (and associated infrastructure costs) are not likely to be impacted by the rule as long as these existing regulations are followed.

2.3.F Comment Summary – The PRA indicates that Ecology will require activities to use “all applicable structural and nonstructural best management practices,” but does not identify what those are or what they will cost.

- Bonagofsky, Jerry
- Double O Ranch (Cindy Kleinhuizen)
- Hampton Lumber (Douglas Cooper)
- Hayden, Nathaniel
- Murray, Joseph
- Underwood Ranch, LLC (Kurt Underwood)
- Verbarendse, Krysta
- Washington Forest Protection Association (Darin Cramer)
- Wilson, Howard

Response to 2.3.F

Our Tier III rule requires that a waterbody designated as a Tier III(B) water must use “use applicable advanced waste treatment and control techniques that reasonably represent the state of the art and must minimize the degradation of water quality to non-measurable levels where total elimination is not feasible.” In our Draft [Implementation Plan](#), we state that for Tier III(B) waters, nonpoint sources [of pollution] must use all applicable structural and nonstructural best management practices. The goal of this is to reduce the degradation of water quality to non-measurable levels where total elimination is not feasible.

Specific best management practices that Washington State has in place for addressing nonpoint pollution can be found in the following documents. These documents define the known best management practices for addressing nonpoint pollution from stormwater, agriculture runoff, and forestry.

- [The Department of Ecology Stormwater Manual for Western Washington](#)⁴
- [The Department of Ecology Stormwater Manual for Eastern Washington](#)⁵
- The forest prescriptions found in the [Forest and Fish rules](#)⁶
- [Washington States Nonpoint Plan appendix K. Clean Water Guidance for Agriculture](#)⁷

2.3.G Comment Summary – What increases in time and cost will be associated with NEPA planning by the USFS for the management of Riparian Reserves if management is allowed under a Tier III – ORW designation? As part of the cost-benefit analysis did the Department explore any increased costs and time requirements associated with US Forest Service environmental analyses for land management activities in these proposed designation landscapes?

- American Forest Resource Council (Matt Comisky)

Response to 2.3.G

The NEPA process must already demonstrate how water quality will be protected with any proposed action on federal land. Ecology does not anticipate increases in time and cost to USFS to conduct NEPA planning within an ORW designation.

2.3.H Comment Summary – ECY [Ecology] appears to acknowledge there could be negative economic impacts from this designation. Has ECY quantified these impacts and what data did it use in relation to the below activity? Timber harvest on US Forest Service Lands, State Trust Lands managed by DNR, or private lands; Mining on Forest Service lands; Recreation on Forest Service Lands, State Trust Lands managed by DNR, or on private lands; or any other economic generating activity related to these lands. Commenter also asked what financial data was used to determine the economic impact of this designation on the management of federal lands.

- American Forest Resource Council (Matt Comisky)

Response to 2.3.H

The proposed ORW designation for the Cascade, Green, and Napeequa rivers falls within national forest, national park, national monument, or wilderness area. One private parcel of 21 acres within national forest is also included in the Cascade River ORW designation boundary. As there are no State Trust Lands managed by DNR within the proposed boundary of any of the ORWs, impacts to these areas were not included in our analyses and are out of the scope of this rulemaking. For timber harvest activities on private land, landowners are required to comply with the Water Pollution Control Act under RCW 90.48, including RCW 90.48.425.

An ORW protection would require private landowners to use all applicable structural and nonstructural best management practices. The goal is to reduce the degradation of water quality

⁴ <https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/2019SWMMWW.htm>

⁵ <https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMEW/2019SWMMEW.htm>

⁶ https://www.dnr.wa.gov/publications/bc_rules_title222wac_032021.pdf

⁷ <https://apps.ecology.wa.gov/publications/documents/2210025.pdf>

to non-measurable levels where total elimination is not feasible, as stated in our [Implementation Plan](#) (p. 7).

The PRA notes that "The proposed rule amendments could affect activities in unlikely or unforeseen circumstances if baseline requirements are not sufficiently protective of the outstanding qualities of the proposed ORW-designated waterbodies. Such circumstances could include:

- Activities that create runoff to proposed ORW-designated rivers, of substances not covered by baseline water quality or land use regulations and permit requirements, where runoff is not mitigated by actions otherwise required in permit.
- Changes to baseline requirements at the federal level, affecting management of federal lands and associated environmental protections.

In the exceptional circumstances listed above, the proposed rule amendments could result in a permittee being required to do additional monitoring for permitted activities. They could also result in:

- An Ecology investigation of degradation sources under the baseline requirements and procedures to identify potential human causes.
- Technical assistance in compliance." (PRA, pg. 12-13)

The ultimate impacts of the exceptional circumstances and potential responses above depend on the results of investigation, including potential human causes. It is only in cases where human causes were identified and additional compliance activities (costs) were necessary, that additional protection of environmental or human health values (benefits) would occur. While we do not believe these circumstances are likely, given baseline regulations, we have added illustrative scenarios, including forestry activities on federal land, to the Final Regulatory Analyses for this rulemaking to provide examples of costs and benefits that could result from the rule in the unlikely circumstances above.

2.3.I Comment Summary - What impact will it have on your budget and is the legislature informed of this action and its potential cost?

- Skamania County Board of Commissioners

Response to 2.3.I

Economic impacts are discussed in the [Regulatory Analyses](#), which reviews the potential qualitative and quantitative costs and benefits of the proposed designations and was available for public review and comment. The impact of an ORW designation to our budget is minimal.

We have kept legislative representatives in affected districts informed of this action throughout the nomination and rulemaking process. We notified legislative representatives in affected districts when we received the nominations in 2021, when we determined the nominations met our eligibility criteria (within 60 days of receiving the nominations), when we began our formal rulemaking process in 2022, and when we began the formal public comment period on the proposed designations in 2023.

2.3.J Comment Summary - Designation of the proposed stretch of the Green River as an Outstanding Resource Water will greatly impair the development of any mineral project near Goat Mountain by setting water quality standards at a deliberately unattainable level, so as to preclude any reasonable development.

If the standard is that no change in water quality is allowed in an ORW, taken to its logical extreme this could mean that development activities could be precluded practically anywhere upstream or alongside the designated ORW. This could in turn lead to severe restrictions or even preclusion of the important projects our members represent if even microscopic changes in water quality could be detected. Paired with the upstream effect, an ORW designation could prohibit potential development in an entire watershed. This could be a devastating economic blow to counties that already struggle to cope with heavy federal ownership of land, thereby shrinking the base of taxable land within the county borders.

The question then, is not whether mining is currently allowed on the lands that would be drawn into this ORW proposal. It most certainly is, and that appears to be the point. Project sponsors are clear about the goal of preventing development within an ORW boundary. However, the proposed ORW designation will deprive property holders of their rights through a Fifth Amendment taking, as explained below.

Fifth Amendment Considerations Are Lacking

The General Mining Law states as follows:

That all valuable mineral deposits in lands belonging to the United States, both surveyed and unsurveyed, are hereby declared to be free and open to exploration and purchase, and the lands in which they are found to occupation and purchase, by citizens of the United States and those who have declared their intention to become such, under regulations prescribed by law, and according to the local customs or rules of miners, in the several mining-districts, so far as the same are applicable and not inconsistent with the laws of the United States.

Mining Law of 1872 § 1, 17 Stat. 91 (codified at 30 U.S.C. § 22) (“Section 22”). Section 22 provides a “free and open” invitation to all U.S. citizens (and those who intend to become U.S. citizens) to enter federal lands to explore for and produce minerals, and engage in activities reasonably incident to mining. This statutory grant allows the attainment of property rights to be self-executing and creates a right of self-initiation for U.S. citizens to enter, occupy and acquire privately owned interests in the public domain. Property interests acquired under this law include the right to explore, possess, profit from and exercise mineral and mineral-related surface rights, and these property interests in federal lands evolve incrementally through the entry, location and

maintenance process. Certain rights and protections are acquired early, before the unpatented claim is even documented in the public records, and before the discovery of any valuable mineral deposit. From their initial location, unpatented mining claim rights are considered “real property in the fullest sense” enforceable by law. As such, Constitutional protections extend “to every sort of interest the citizen may possess.”

The Fifth Amendment prohibits governmental “takings” of private property for public use without “just compensation.” A taking occurs if there is: (1) an “actual” taking (i.e., the government physically (or legislatively) confiscates or occupies property); or (2) a “regulatory” taking (i.e., government action, by legislation or regulation deprives the owner of economically reasonable use of the property). Whenever the government’s action constitutes a taking, it is required to pay the property owner “just compensation” (i.e., fair market value).

In the context of an “actual” taking, any seizure from the bundle of privately held rights is considered a categorical or per se taking, requiring appropriate compensation. This means the constitutional protection is triggered whether the government takes or limits only a portion of the privately held interests, or takes the entirety of rights held by the private party. This point has been emphasized by the United States Supreme Court as recently as 2021, when it struck down a California access regulation that limited the rights of farm owners to exclude others from their property. “When the government physically takes possession of an interest in property for some public purpose, it has a categorical duty to compensate the former owner, regardless of whether the interest that is taken constitutes an entire parcel or merely a part thereof.”

Courts have consistently held that appropriations of patented mining claim interests constitute an “actual taking” under the Fifth Amendment. As Ecology determines whether to proceed with this rulemaking, Fifth Amendment considerations should be front of mind. More than a century of caselaw has upheld the Fifth Amendment rights of property holders, including mining claims such as those near Goat Mountain.

Unfortunately, the Preliminary Regulatory Analyses conducted by Ecology do not seem to even ponder the Fifth Amendment implications of the Proposed Rule. Such considerations are likely routine for transportation or other government agency projects where rights-of-way or other parcels must be acquired in order to complete the project, or where a proposed law or regulation may diminish the economic value of privately held property. Any such analysis is conspicuously absent here. The costs to the state of proceeding without adequate contemplation of this point could be substantial.

- (American Exploration & Mining Association)

Response to 2.3.J

An ORW designation is not a physical appropriation of any land or mineral claim.

The ORW designation only applies to the specified waters upstream from the designation boundary. In the case of the Green River, the ORW designation is on federal lands. If a mining facility were to be proposed on those federal lands, their operations would currently need to meet our state water quality standards.

In assigning the Green River an ORW designation, it means that any mining operations, like any other industrial activity, would be prohibited from discharging pollution into waters within the designation boundary.

2.4 SEPA / Environmental Impacts

2.4.A Comment Summary – Commenters noted that Ecology has not described the environmental impacts of the proposed rule, including land or shoreline use, or preventing roads or public access, or that the SEPA is incomplete.

- Black, Laurel
- Bonagofsky, Jerry
- Citizen Action Defense Fund (Jackson Maynard)
- Finnegan, Leo
- Gromlich, Rebecca
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Ketcham, Terry W.
- McCall, Kris
- Mitchell, Cindy (Washington Forest Protection Association)
- Rayonier (Holli Johnson)
- Sierra Pacific Industries (John Gold) (Cascade River)
- Smithing, Robert
- Underwood Ranch, LLC (Kurt Underwood)
- Washington Forest Protection Association (Darin Cramer)

2.4.B Comment Summary – Commenters noted that Ecology has not disclosed appropriate mitigation of impacts.

- American Forest Resource Council (Matt Comisky)
- Sierra Pacific Industries (John Gold) (Cascade River)

2.4.C Comment Summary – Commenters noted the lack of disclosed impacts to management activities related to wildfires.

- Ballard, Brian
- Black, Laurel
- Bonagofsky, Jerry
- Button, Nancy
- Citizen Action Defense Fund (Jackson Maynard)
- Cowdrey, Lori
- Eidsness, Deborah Kb
- Finch, Indra
- Frey, Donald
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hennig, Jason
- Hogeweide, Ted
- Knudsen, Elizabeth
- Leggett, Bj
- M Long, Teresa
- Macpherson, Darcy
- Mccall, Kris
- Miller, James
- Nyborg, Julie
- O'haegher, Kyra
- Saltvick, Brian
- Stienbarger, Doug
- Underwood Ranch LLC (Kurt Underwood)

- Washington Forest Protection Association (Darin Cramer)
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to comments 2.4.A-2.4.C

Ecology is required to use the State Environmental Protection Act (SEPA) checklist to help determine whether a proposal will have significant adverse environmental impacts. The intent of this checklist is to identify measures to avoid or minimize likely impacts. Ecology completed a SEPA checklist on May 26, 2023, which we included with the proposed rule, and determined that our proposal to designate Soap Lake, and portions of the Cascade, Napeequa, and Green rivers would not likely result in harm to the environment. Rather, we concluded that this proposal would result in increased environmental protections for those waters. With that determination, we issued a “Determination of Nonsignificance”, meaning this proposal will not have a probable significant adverse impact on the environment. With no probable adverse impacts on the environment identified, including mitigation measures would not be appropriate.

The supplemental sheet for non-project actions requires that Ecology answer "How would the proposal be likely to affect land and shoreline use, include whether it would allow or encourage land or shoreline uses incompatible with existing plans?" In our answer, which is presented fully under Question 1 on the Supplemental Sheet, we note that the goal of this rulemaking is to limit new discharges of pollutants to waterbodies. Any land or shoreline use must be compatible with that water quality protection, should a designation be adopted.

Finally, an ORW designation does not limit public access to a waterbody, nor does it place specific limits on recreation. Ecology's water quality standards cannot limit public access to a waterbody. That decision is made by the landowner or land manager. The SEPA document provides an analysis of potential adverse environmental impacts.

The potential for an ORW to prevent future road construction does not qualify as a potential adverse environmental impact.

We consider fire suppression activities an exception to ORW protections. We have edited our Draft [Implementation Plan](#) to include this activity in our list of example exceptions (p. 10 "Promoting and Assisting Voluntary Compliance").

2.4. Comment Summary – How does a “project” differ from a “non-project”? What requirements would you have had to met if it was a project? Did this limit engagement with all potential counties?

- Skamania County Board of Commissioners (Richard Mahar, TW Lannen, Asa Leckie)

Response to 2.4.D

WAC 197-11-704 defines project actions as "decision on a specific project, such as a construction or management activity located in a defined geographic area." Nonproject actions involve decisions on policies, plans, or programs.

This rulemaking falls under the following category of nonproject action: WAC 197-11-704(2)(b)(i) The adoption or amendment of legislation, ordinances, rules, or regulations that contain standards controlling use or modification of the environment.

This nonproject action does not limit engagement with "all potential counties." We conducted extensive outreach and engagement with all counties involved with this rulemaking, as well as provided multiple public opportunities to engage with this rulemaking. Ecology's public engagement is outlined in the [Implementation Plan](#).

3. Rule Proposal

3.1 General eligibility comments or need for baseline data

3.1.A Comment summary – General comments stating the lack of sufficient data to support the designations, request to provide data in accordance with RCW 90.48.580 or information to support the ORW designations, or demonstrate a need for the designation.

- American Forest Resource Council (Matt Comisky)
- Ballard, Brian
- Bare, Bruce
- Board of Clallam County Commissioners (Randy Johnson)
- Bonagofsky, Jerry
- Boyd, Wade
- Brown, Angela
- Button, Nancy
- Cowdrey, Lori
- Dills, Quentin
- Eidsness, Deborah KB
- Finch, Indra
- Frey, Donald
- Grigg, Scott
- Gromlich, Rebecca
- Hampton Lumber (Anjolene Ngari)
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hayden, Larry
- Hennig, Jason
- Hillery, Jamie
- Hogeweide, Ted
- Iverson, Gordon
- Janicki, Peter
- Janicki, Robert
- Knudsen, Elizabeth
- Leavitt, Mike
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- MacPherson, Darcy
- Manning, Carter
- Meek, Josh
- Miller, James
- Mitchell, Cindy (Washington Forest Protection Association)
- Mitchell, Jessica
- Nielsen, David
- Nyborg, Julie
- Oakes, Angeles
- O'Haegher, Kyra
- Rayonier (Holli Johnson)
- Rohrbach, Eric
- Roscoe, John
- Saltvick, Brian
- Sierra Pacific Industries (John Gold)
- Skagit County Commissioners (Ron Wesen)
- Smithing, Robert
- Stargell, Aubrey
- Stienbarger, Doug
- Strom, Eric
- The Molpus Woodlands Group, LLC (Ruth Cook)
- Underwood Ranch LLC (Kurt Underwood)
- Washington Forest Protection Association (Darin Cramer)
- Wolf, Deanna
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

3.1.B Comment Summary - Commenter notes that it would be arbitrary to designate a waterbody as Tier I, II, or III without objective measurement of water quality parameters.

- Sierra Pacific Industries (John Gold) (Cascade)

3.1.C Comment summary – Demonstrate how data shows that Cascade is higher quality or more pristine than other comparable waters in the area.

- Sierra Pacific Industries (John Gold) (Cascade)

3.1.D Comment summary – Concerns regarding anthropogenic disturbance (recreation, mining, roads) in the Cascade River’s watershed not meeting eligibility requirement WAC 173-201A-330(1)(a) and request to provide data demonstrating eligibility.

- Sierra Pacific Industries (John Gold) (Cascade)

3.1.E Comment Summary - Why did we not collect water quality data on the Napeequa River despite known high phosphorus levels in the upper watershed?

- Chelan County (Mike Kaputa) (Napeequa)

Response to 3.1.A-3.1.E

The goal of an ORW designation is to protect a waterbody from future sources of degradation so that the current quality of the water is maintained well into the future. The aim is not to fix a demonstrated water quality problem, rather to prevent sources of pollution from affecting valued state waters.

All waterbodies in Washington are protected under Tier I and Tier II, whether we have data to show the waterbody demonstrates that it supports a designated use or not. This is because a designated use represents a management goal for a waterbody. Additionally, a waterbody does not need to be determined as meeting all water quality criteria to be designated as Tier III - ORW. The Cascade, Napeequa, and Green Rivers are all proposed based on relatively pristine conditions, recreational value, and exceptional statewide ecological significance. Soap Lake has been proposed based on unique aquatic habitat, recreational value, and statewide ecological significance. The eligibility criteria were determined for each river based on the available credible water quality, habitat, ecological, and land-use data. The analysis describing how each eligibility criteria is met is described in detail in the [ORW Technical Support Document](#).

The rules that guide the development of ORW do not necessarily require Ecology to independently collect water quality data for every given waterbody pollutant or condition to determine if a waterbody demonstrates high water quality. Waterbodies that have limited impact from human sources of pollution are assumed to have good water quality unless otherwise determined through site-specific studies. However, we did consider available information in assessing eligibility for the three rivers. That information is included in our [Technical Support Document](#) and includes:

1. General level of development within the proposed boundary.
2. Whether there are existing permitted discharges to a waterbody.
3. Habitat assessment information, including evaluation of riparian function, hydromodification, and aquatic habitat.

To help inform our assessment of the condition of the water, Ecology used habitat assessment information when available as part of our review. Specific reports include:

- US Forest Service Watershed Condition Framework (Cascade and Green River)
- National Marine Fisheries Biological Opinion (Cascade River)
- Ecology Water Quality Monitoring Report (Green River)

Comparison of the waterbodies proposed in this rulemaking to other waters that may or may not also be candidates for ORW designation is not necessary to adopt a Tier III designation for a waterbody.

The intent of the Credible Water Quality Data Act is to ensure high quality data are used for “assessment of the status of a water body relative to the surface water quality standards” (RCW 90.48.570). The act defines such an action as “(a) Determining whether any water of the state is to be placed on or removed from any section 303(d) list; (b) Establishing a total maximum daily load for any surface water of the state; or (c) Determining whether any surface water of the state is supporting its designated use or other classification” (RCW 90.48.580). Designating a waterbody as an ORW under our anti-degradation water quality standard does not fall under the actions defined in the Credible Data Act.

Campgrounds and other recreational facilities and associated human activities are already required to not impact water quality. High use and human activity do not, on their own, demonstrate impairment of water quality or designated uses. We relied on the available data and information to determine the general conditions of the area proposed for ORW designation. The lack of common sources of pollutant sources in the watershed is the reason for a lack of data to demonstrate pollution. Data collection resources are unlikely to be spent to search for pollution where little to no common sources of pollution are present. Data to confirm a lack of pollution is not necessary when sources of pollution have not been identified. Common recreational use and permitted facilities are not usually sources of pollution. The available data to characterize and confirm the high-quality water in the Cascade watershed are provided in the Technical Support Document.

We believe it reasonable to conclude that the lack of human-caused sources of impairment to beneficial uses and documented minimal riparian degradation indicates a waterbody has high water quality.

3.1.F Comment Summary – Proponents provided comment on why they chose the Cascade, Green and Napeequa rivers for consideration as ORWs.

- American Rivers (Sarah Dyrdaahl)
- American Whitewater (Thomas O’Keefe)
- Cascade Forest Conservancy (Molly Whitney)

- Trout Unlimited (Dean Finnerty)
- Washington Wild (Tom Uniak)
- Wild Salmon Center (Jess Helsley)

Response to 3.1.F

Comment noted. Ecology thanks the project proponents for their nomination.

3.2. Doesn't meet eligibility criteria

3.2.A Comment Summary – Cascade River doesn't meet criteria of "relatively pristine" and in a protected area because of the relatively higher density of roads and the presence of campgrounds.

- Dills, Quentin
- Hillery, Jamie
- Janicki, Peter
- Janicki, Robert
- Skagit County Commissioners (Ron Wesen)
- Sierra Pacific Industries (John Gold)
- Wolf, Deanna

Response to 3.2.A

Based on information provided by the US Forest Service, Ecology notes in our [Technical Support Document](#) that approximately 33 miles of road that are maintained as "suitable for passenger cars" are found within the proposed boundary. This includes 22.7 miles of the Cascade River Road that follows the river to the headwaters of the North Fork. The existence of these roads and other less maintained roads does not indicate to Ecology that the proposed boundary is more degraded than what we would consider "relatively pristine." Minor development related to recreation, including trailheads and the two campgrounds, are likewise not considered development that would lead to long-term lowering of water quality for the Cascade River. The location of campgrounds and other recreational features are noted in the Technical Support Document.

One commenter notes that Ecology has mapped "roadless areas" in error. "Roadless Area" is not simply defined as an area without roads. The US Forest Service [maintains maps of Inventoried Roadless Areas](#)⁸, to which Ecology referred in their review, and are available online. The Technical Support Document notes that "Roadless areas were originally identified as part of a Forest Service Roadless Area Review and Evaluation conducted in the 1970's for areas of undeveloped land larger than 5,000 acres, with the intent to designate wilderness or other management directions" (p. 41). We further describe that the 2001 Roadless Area Conservation Rule identifies roadless areas as "having properties such as high quality or undisturbed soils, water, and air; sources of public drinking water; or primitive, semi-primitive, non-motorized and

⁸ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsmrs_072459.pdf

semi-primitive motorized classes of dispersed recreation. The Roadless Area Conservation Rule sets limits on road construction, reconstruction, and timber harvest."

3.2.B Comment Summary - Commenters also note that the majority of the proposed Cascade River is within national forest and managed as Least Successional Reserve, which is not an eligible category under WAC 173-201A-330(1).

- Skagit County Commissioners (Ron Wesen)
- Sierra Pacific Industries (John Gold)
- Hillery, Jamie

Response to Comment 3.2.B

The entire proposed boundary of the Cascade River is within one of the enumerated eligibilities categories listed under WAC 173-201A-330(1): Wild and Scenic River designation, within the North Cascades National Park, and within the Glacier Peak Wilderness Area. The majority of the proposed boundary is within the Glacier Peak Wilderness Area. While tributaries to the protected Wild and Scenic Cascade River within the National Forest are not within one of the categories listed under 173-201A-330(1), we are including tributaries in our proposed protections for the Cascade River to protect the downstream designation. This is consistent with WAC 173-201A-260(3)(b), which states that “[u]pstream actions must be conducted in manners that meet downstream waterbody criteria.... the criteria associated with the most upstream uses designated for a water body are to be applied to headwaters to protect... the designated downstream uses.”

3.2.C Comment Summary – Commenter noted that the Cascade River watershed has exposed deposits of lead, silver, zinc, gold, copper, and arsenic (all pollutants with specific numeric criteria in WAC 173-201A-240) and some occur in close proximity to surface waters. What monitoring data did WDOE rely upon to determine if these pollutants require mitigation to meet the obligation to reduce discharges through AKART? What monitoring data did WDOE rely upon to determine if pollutants originating from existing roads require mitigation to meet the obligation to reduce discharges through AKART?

- Sierra Pacific Industries (John Gold)

Response to Comment 3.1.C

We relied on the available data and information to determine the general conditions of the area proposed for ORW designation. The lack of common human-caused sources of pollutants in the watershed is the reason for a lack of data to demonstrate pollution. Any exposure to natural minerals that may be present in the waterbody would not disqualify a waterbody to be recognized as a Tier III waterbody. Data collection resources are unlikely to be spent to search for pollution where little to no common sources of pollution are present. Data to confirm a lack of pollution is not necessary when sources of pollution have not been identified.

WAC 173-201A defines AKART as “an acronym for "all known, available, and reasonable methods of prevention, control, and treatment." AKART shall represent the most current methodology that can be reasonably required for preventing, controlling, or abating the

pollutants associated with a discharge. The concept of AKART applies to both point and nonpoint sources of pollution...” AKART is a process for managing discharges, not for waterbodies where no current water quality clean-up plans or sources of human-caused pollution are present.

3.2.D Comment Summary – Cascade River doesn’t meet criteria of having “high water quality and unique recreational value” or information provided doesn’t adequately demonstrate how the waterbody meets this criteria. Commenters note that only a small portion of the Cascade is used for recreation. Commenters also note that Ecology has disregarded “readily available information” indicating the Cascade River does not have high water quality.

- Dills, Quentin
- Hillery, Jamie
- Janicki, Peter
- Janicki, Robert
- Sierra Pacific Industries (John Gold)
- Skagit County Commissioners (Ron Wesen)
- Wolf, Deanna

Response to Comment 3.2.D

We relied on data from the US Forest Service Watershed Condition Framework and a National Marine Fisheries Biological Opinion that provided watershed analyses. These reports indicate high water quality in this part of the Cascade River. Without additional information provided by the commenter, it is unclear what readily available information was disregarded in our Cascade River analysis.

Regarding the unique recreational value, the commenters are correct to identify the unique run on the mainstem Cascade River. We include tributaries to the mainstem Cascade River within the ORW boundary to protect the downstream water quality of the river. We do not assume that all tributaries included in this protection demonstrate unique recreational value.

In addition to the exceptional whitewater kayaking on the Upper Cascade, the Cascade River have several unique hiking opportunities, including the Hidden Lake Trail, which makes two crosses over Sibley Creek, which is described by the Washington Trails Association as “one of the crown jewels of hiking in Washington State” ([Technical Support Document](#), p. 44).

3.2.E Comment Summary – Cascade River doesn’t meet criteria of having “exceptional statewide ecological significance.”

- Dills, Quentin
- Hillery, Jamie
- Janicki, Peter
- Janicki, Robert
- Wolf, Deanna

3.2.E Comment Summary – Commenter states that Ecology makes a determination of meeting “exceptional statewide ecological significance” because the Cascade supports many species of fish, has recreational value, and small portions of the river are designated under the Wild and Scenic Rivers Act. Commenter also notes that only a small portion of the proposed ORW for the Cascade is accessible to fish or contains fish habitat.

- Skagit County Commissioners (Ron Wesen)

3.2.F Comment Summary - Please provide a comparative analysis of quantitative biological, habitat, and geomorphic data for the Cascade River versus other, comparable fifth order rivers in the North Cascades physiographic province upon which WDOE is relying to make its determination that the proposed segments are of exceptional significance.

- Sierra Pacific Industries (John Gold)

Response to Comments 3.2.E -3.2.F

Ecology presents the data and information to support the designation of the proposed portion of the Cascade River as an ORW. Comparison of this waterbody to other waters that may or may not also be candidates for ORW designation is not necessary to adopt this Tier III designation for this waterbody.

The [Technical Support Document](#) provides supporting information regarding how this river meets the eligibility criteria under WAC 173-201A-330(1)(d) that "the water is of exceptional statewide ecological significance."

To support this determination, the Technical Support Document notes that the upper Cascade River supports a unique population of Chinook salmon, referred to as Upper Cascade Spring Chinook, that is genetically distinct from all other Chinook populations in the Skagit Basin (TSD, p. 44). The Technical Support Document (p. 44) also notes that the Skagit Chinook Salmon Recovery Plan describes that Skagit River Basin as "the largest and one of the most unspoiled strongholds of fish and wildlife in the Puget Sound". As stated in the Technical Support Document, the recreational value or the Wild and Scenic designation contribute to the Cascade River’s eligibility in this category.

Salmon, steelhead, and trout inhabit, spawn, and rear in nearly the entire mainstem of the Cascade River, and a small number of tributaries as shown in the Technical Support Document. However, ORW designation protects the high quality of water available to all aquatic life, including non-game fish and other species, and to support and maintain high quality downstream conditions for salmonids.

3.2.G Comment Summary - What length of this road is within the riparian zone of the Cascade River and its tributaries and how many stream crossings exist? Are there features of this road (e.g., stream crossing structures) which reduce the ability of native salmonids and other aquatic organisms to access and/or utilize historic habitat and how does this comport with the WDOE characterization of the subject waterways as “having exceptional ecological value”, “pristine”, and “relatively pristine”?

- Sierra Pacific Industries (John Gold)

Response to 3.2.G

The ability for aquatic species to migrate in a waterbody is independent of designated uses and our consideration of an ORW designation. Human structures and features that impede migration of fish and other species to high quality waters in the watershed should not impact a waterbody's recognition as a high-quality waterbody worthy of Tier III designation. Structural impediments to migration that previously existed prior to human impact should be addressed regardless of waterbody designation.

3.3 Designation boundary and maps

3.3.A Comment Summary – Comments questioned why Ecology did not release GIS files with the rule language.

- Faubion, Andy
- French, Kerry (Green)
- Hayden, Larry (Green)
- Maahs, Kathy
- Oakes, Angeles
- Skagit County Commissioners (Ron Wesen)

Response to 3.3.A

The map provided in our [Technical Support Document](#) was created in GIS and saved as a PDF to help visualize the proposed boundary in an easily shareable format. Ecology provides the latitude and longitude of the downstream-most boundary of the proposed ORW area in our draft and final rule language. The rule language states that the proposed protections include the river and all tributaries upstream of this location. Ecology has publicly available GIS files of Washington's waters on our website and has shared a link to this information directly with those requesting it. Anyone can view our maps of surface waters of the state on Ecology's [Washington's Hydrography Dataset Program webpage](#).⁹ We provide a PDF map in our supporting documents as a helpful visual, but we don't expect the public to have the required resources to review GIS files as part of the rule packet.

We would also like to note that stream mapping models, such as the National Hydrography Dataset (NHD), are updated regularly to reflect the most recent information. Putting a GIS file in rule would limit that information from future updates that may reflect a more accurate representation of stream location and extent within an ORW boundary, because it would mean we would adopt a stream map in a moment in time, which could become outdated. Latitude and longitude are a more static spatial description of a waterbody segment. This approach to

⁹ <https://ecology.wa.gov/Research-Data/Data-resources/Geographic-Information-Systems-GIS/Hydrography-dataset-WASHD>

describing waterbodies and their tributaries in state rule is also consistent with previous and current description of our water quality standards (Example: WAC 173-201A-602).

3.3.B Comment Summary – Comments on maps provided, including that maps are hard to read, don't identify private property, incorrectly state that no mineral rights are within the proposed area for the Cascade River, don't show existing roads for wildfire management, or don't identify county zoning areas.

- Bynum, Ellen
- Dills, Quentin
- Good, Randy and Aileen
- Hillery, Jamie
- Janicki, Peter
- Janicki, Robert
- Skagit County Commissioners (Ron Wesen)
- Stargell, Aubrey
- Westergreen, Tom
- Wolf, Deanna

Response to 3.3.B

Our [Technical Support Document](#) and other rulemaking materials clearly identify the private parcel within the proposed Cascade River ORW boundary. Our draft rule documents do not claim that no mineral rights are within the proposed boundary for the Cascade River. We state on page 35 of the Preliminary Regulatory Analyses that there are no active instream mining claims.

Roads within the proposed boundary for the Cascade River are presented on page 40 of the Technical Support Document. This map includes major roads, trailheads, and campgrounds in the upper Cascade River watershed, as provided by the US Forest Service.

County zoning designations are not applicable within the proposed designation boundary because the proposed area for the Cascade River is entirely within federal land, outside of Skagit County zoning areas.

3.3.C Comment Summary – There are additional assertions that are factually incorrect. The Proponent asserts that no private property is contained within the proposed segments. The WDOE has noted that one private parcel exists which has been identified. Identification of additional parcels is unable to occur because WDOE has stated it lacks maps available which our county GIS department can use to accurately assess whether there are other parcels or inaccuracies such as known county roads, campsites, trailheads, etc.

- Skagit County Commissioners (Ron Wesen)

Response to 3.3.C

We would like to note that the information contained in the proponents' nomination is not part of the formal rule proposal. Our [Technical Support Document](#) identifies the 21-acre private parcel that falls within the proposed boundary. We identified this information from the Skagit County Assessor's website, which is available to the public. The Department of Ecology does not keep independent property records that are not already available from county assessor records.

Similarly, locations of campsites and trailheads is not information that Ecology maintains. This information is publicly available. Ecology recommends anyone looking for information on the location of campsites and trailheads to contact the US Forest Service. Alternately, the US Forest Service maintains a [publicly available interactive map](#) where you can view the location of information such as trailheads, hiking trails, and campgrounds within lands managed by the US Forest Service.

Because Ecology stated in the formal rule proposal and supporting documents that the proposed downstream boundary of the Cascade River is where the Cascade River enters the Mt. Baker-Snoqualmie National Forest, and continues upstream to headwaters, anyone can view the abundance and location of various recreational opportunities within this area. If any entity requests assistance understanding the proposed boundary, we can provide that assistance.

3.3.D Comment Summary – Commenter asked if tributaries included in the Cascade and Green Rivers include all typed waters (Fish, Non-Fish Perennial, and Non-fish nonperennial).

- American Forest Resource Council (Matt Comisky)

Response to 3.3.D

Yes. We include all tributaries and all typed water in the ORW designation to protect the downstream qualities of the river.

4. Implementation

4.1 General Implementation comments

4.1.A Comment Summary – How would this designation potentially affect downstream waters?

- Dunham, Judith
- Faubion, Andy
- French, Kerry
- Hayden, Larry
- Maahs, Kathy
- Miller, Barbara
- Skagit County Commissioners (Ron Wesen)

Response to 4.1.A

ORW protections only apply to the waterbody within the designation boundary, as described in the draft rule language and the [Technical Support Document](#). The designation of downstream uses are not affected by an ORW designation, but downstream waters may also benefit from protection of water quality conditions upstream.

4.1.B Comment Summary - What ownership does this impact: State Forest Trust and School Trust Lands, Federal Forests or BLM, and/or private holdings, others?

- Skamania County Board of Commissioners (Richard Mahar, TW Lannen, Asa Leckie)

Response to 4.1.B

The proposed ORW designation for the Green River falls within national forest and national volcanic monument land.

The proposed ORW designation for the Napeequa River falls within wilderness area and a small section of national forest (about 400 meters of stream) land.

The proposed ORW designation for the Cascade River falls within national forest, national park, and wilderness area. One private parcel of 21 acres within national forest is also included.

4.1.C Comment Summary – What policies will Ecology use to keep designated waters from undergoing any degradation?

- Skagit County Commissioners (Ron Wesen)

Response to 4.1.C

The [Implementation Plan](#) describes how we would implement protections on a Tier III(A) ORW. The plan explains that if "Ecology receives a request for a proposed new or expanded activity that would discharge to a Tier III(A) water, that request would have to demonstrate that the discharge would not result in any degradation of water quality. Any proposed water quality discharge that would result in long-term lowering of water quality is prohibited within an ORW."

Similarly, the Implementation Plan provides the following information on what may change when issuing 401 Certifications for an activity that would discharge to an ORW: "A Section 401 Certification may require conditions to protect an ORW that may become part of the permit" (Rule Implementation Plan, p. 6).

For other activities on federal land, the Implementation Plan describes how Ecology will coordinate with federal agencies to ensure compliance with Washington State surface water quality standards, including protection of ORWs.

4.1.D Comment Summary – What additional rules are going to be placed on private landowners or businesses that are next to a tributary of an ORW that is not already covered [protected] by the Clean Water Act.

- Hayden, Larry (Green)

Response to 4.1.D

Currently all state waters in Washington are protected by the federal Clean Water Act and Washington's Water Pollution Control Act (Chapter 90.48 RCW). Under Chapter 90.48 RCW, private landowners and businesses are not allowed to pollute state waters, regardless of an ORW designation.

For all state waters, if a private landowner or business needs a permit for an activity that may impact water quality, that activity or discharge must be conducted in manner that would meet water quality standards to protect designated uses. In the case of possible impacts to a designated ORW, that activity or discharge must also meet the additional requirements of the ORW designation as described in WAC 173-201A-330. Meeting the requirements would be situation specific, such as mitigation measures to ensure protection of the ORW.

4.1.E Comment Summary – Grant County and City of Soap Lake may need to revise stormwater run-off policies to assure no further degradation of lake water.

- Kovach, Alex

Response to 4.1.E

Comment noted. This might be the case if stormwater is going to the lake without stormwater best management practices in place. Ecology is available for any questions these jurisdictions may have.

4.1.F Comment Summary – What specific activities would be exempt from environmental review or existing regulations that could potentially impact water quality?

- Dunham, Judith
- Faubion, Andy
- French, Kerry
- Hayden, Larry
- Maahs, Kathy

Response to 4.1.F

As stated in the Rule [Implementation Plan](#) (p. 3), “in some situations, limited degradation of an ORW-designated waterbody may occur if the activity would not result in permanent or long-term lowering of water quality. Those situations include:

- Temporary actions necessary to protect the public interest;
- Treatment work bypasses for sewage, waste, and stormwater when such a bypass is unavoidable to prevent loss of life, personal injury, or severe property damage; and

- Response actions taken in accordance with the Comprehensive Environmental Response Compensation and Liability Act to alleviate a release into the environment of substances which may pose an imminent and substantial danger to public health or welfare.”

In addition, an ORW designation does not protect a waterbody from sources of pollution that come from the air. These exceptions are provided under [WAC 173-201A-330\(4\)](#).

Common example activities that may result in temporary water quality degradation, but are allowed under this protection may include, but are not limited to; temporary road and trail maintenance, temporary road construction and reconstruction, temporary culvert placement, wildfire management activities, and invasive species management. Ecology staff are available to provide assistance when requested to review whether a proposed land action could impact an ORW designation.

4.1.G Comment Summary - The proposed language in Appendix A of the Implementation Plan: Outstanding resource waters should not be designated where substantial and imminent social or economic impact to the local community will occur, unless local public support is overwhelmingly in favor of the designation.

EPA recommends adding guidance on how “substantial and imminent social or economic impact to the local community” and “overwhelmingly in favor of the designation” will be assessed or determined.

- US Environmental Protection Agency (Lindsay Guzzo)

Response to 4.1.G

Ecology updated the Implementation Guidance document to reflect how substantial and imminent social or economic impact to the local community and overwhelmingly in favor of the designation will be assessed or determined.

When evaluating any proposed rule, including for the designation of ORWs, Ecology must follow requirements under Washington’s Administrative Procedures Act and the Regulatory Fairness Act Chapters 34.05 RCW and 19.85 RCW.

The Washington Administrative Procedure Act (APA; RCW 34.05.328(1)(d)) requires Ecology to evaluate significant legislative rules to “determine that the probable benefits of the rule are greater than its probable costs, taking into account both the qualitative and quantitative benefits and costs and the specific directives of the law being implemented.”

The APA also requires Ecology to “determine, after considering alternative versions of the rule...that the rule being adopted is the least burdensome alternative for those required to comply with it that will achieve the general goals and specific objectives” of the governing and authorizing statutes.

The Washington Regulatory Fairness Act (RFA; Chapter 19.85 RCW) requires Ecology to evaluate the relative impact of proposed rules that impose costs on businesses in an industry. It compares the relative compliance costs for small businesses to those of the largest businesses affected.

All determinations are based on the best available information at the time of publication. Ecology makes available for public comment these analyses, and publishes a final Regulatory Analyses based on public feedback received during the public comment period.

When such impacts to the local community are reported in the PRA, the local community has an opportunity to provide support for the rule notwithstanding the social and economic impacts identified. Ecology will evaluate the benefits of the ORW designation identified in the PRA, as well as the information provided in support of the designation by entities in the local community, to determine if the support meets that required by the ORW rule. Staff will then make a recommendation to Ecology's Director on whether the ORW designation should be adopted considering all information provided. The rule, if adopted, is then open to appeal from any entity who believes the Ecology's evaluation of the support for the designation was inaccurate.

4.1.H Comment Summary - QCBID operates the Soap Lake Protective Works for the U.S. Bureau of Reclamation to remove irrigation return flows from the groundwater around Soap Lake imported to this area via the Columbia Basin Project irrigation system. QCBID notes the draft Rule Implementation Plan's favorable acknowledgement that the operation of the Soap Lake Protective Works has maintained and will continue to maintain the unique mineral properties of Soap Lake water by intercepting irrigation return waters from the ground in this area by its operation guidelines. The beneficial role that the Soap Lake Protective Works plays in helping preserve the water quality of the lake is also discussed in the Proposed ORW Draft Technical Support Document (Publication 23-10-023). QCBID understands that the Rule proposal, including the Rule itself and the Rule Implementation Plan, will not alter or otherwise impact QCBID's ongoing operation of the Soap Lake Protective Works. QCBID appreciates this being made clear in the Rule proposal documents.

- Qunicy-Columbia Basin Irrigation District (Roger Sonnichsen)

Response to 4.1.H

Comment noted. We also appreciate the continued monitoring of the lake as a management tool to ensure ongoing operations meet the objective of the Soap Lake Protective Works.

4.2 Permitting and authority

4.2.A Comment Summary – Who is responsible for overseeing an ORW designation when permitting any activity?

- Dunham, Judith
- Faubion, Andy
- French, Kerry
- Hayden, Larry

- Maahs, Kathy

Response to 4.2.A

This rule does not change existing permitting authorities. Ecology may be consulted by other state and local authorizing entities regarding actions that may have the potential to impact water quality over which Ecology does not have a direct regulatory role. We can also provide general guidance to authorizing entities when requested to review whether there is a nexus between an ORW designation and the kinds of activities for which they have an authorizing role.

Ecology's Water Quality Program has the authority to review and determine whether a proposed activity meets the requirements of the state surface water quality standards, including protecting an ORW designation, through the following permitting programs:

- National Pollutant Discharge Elimination System (NPDES) permits and
- Water Quality 401 Certifications for federal permits and licenses that result in a discharge to state waters.

Ecology's Water Resources Program may consider compliance with surface water quality standards, including protecting an ORW designation, through water rights permits.

Ecology will coordinate with federal, state, and local permitting authorities and assist as requested to review whether proposed land use actions meet the requirements of an ORW designation. For more details, see the Rule [Implementation Plan](#).

Ecology will also identify the Best Management Practices that are needed to protect water quality for any ORWs that are Tier III(B) designations.

3.2.B Comment Summary – How would Ecology apply ORW rules in a waterbody managed by the US Forest Service that may already exceed state water quality standards?

- Chelan County (Mike Kaputa)

Response to 4.2.B

This topic is addressed under the "Implementation and Enforcement" section of the the Rule [Implementation Plan](#), which discusses how an ORW designation may or may not affect land use decisions, including actions for which Ecology plays an authorizing role. Under Section 401 of the Clean Water Act, federal permitting or licensing of activities that may result in a discharge to waters within the state must receive a Clean Water Act Section 401 water quality certification from the state. In this case, Ecology would review such an action and condition the permit or license to ensure water quality standards and antidegradation conditions of the ORW designation are maintained.

The ORW designation is designed to protect water from future degradation. In this manner Ecology would work with the federal government on any proposed activities which will degrade the water. This could be in the form of recommending best management activities that Washington State has developed to protect water from nonpoint pollution or in conditioning any discharges that need federal permits or federal Clean Water Act certifications.

4.2.C Comment Summary – What triggers the application of ORW rules? It is unclear what activities are governed by ORW rules, the permitting nexus for ORW rules, and who is responsible for determining when or how ORW rules apply. Do the ORW rules apply when there is an Ecology permit or funding involved, do the rules also apply to federal and local activities and permitting, and who makes this determination? We can think of many new and ongoing activities which may be subject to ORW rules, depending on their interpretation, and a scenario where Ecology would determine, on a case-by-case basis, how the rules apply. We believe that Ecology must do more work to understand and clarify how and when the rules apply before adopting these new rules.

- Chelan County (Mike Kaputa)

Response to 4.2.C

ORW protections apply to a waterbody after that designation has been adopted. A Tier III(A) water must be protected from all degradation except in circumstances described under WAC 173-201A-330(4).

As stated in the Rule [Implementation Plan](#), Washington's antidegradation requirements, including protection of ORW's, apply to new or expanded Clean Water Act and Washington Water Pollution Control regulated activities.

The Rule Implementation Plan provides the following information on how Ecology may review projects on federal land to ensure protection of an ORW:

"States and Tribal governments have the authority to review and approve, condition, or deny proposed Federal projects, actions, and activities directly affecting waters of the United States. In Washington, Ecology is the certifying authority for projects on state lands and is responsible for issuing Section 401 water quality certifications to ensure federal projects meet Washington's water quality standards.

Under Section 401 of the Clean Water Act, federal agencies can't issue a license or permit before the state makes a determination on a water quality certification request or waives our action to certify.

To protect designated ORWs from degradation, a Section 401 water quality certification may require conditions that will become part of the license or permit."

For activities are permitted by local governments, any local permitting authority would have the responsibility to ensure that a permitted activity with the potential to affect surface water quality adhere to the appropriate permit conditions to ensure the action does not pollute state waters.

Ecology will coordinate with local permitting authorities and provide assistance as requested to review whether proposed land use actions could impact the ORW designation. The decision to permit or otherwise authorize such actions remains the responsibility of the authorizing agent.

4.2.D Comment Summary - QCBID supports the requirement described in the draft Rule Implementation Plan that new water resources permit applicants and change applicants demonstrate the use of water will not continue to increase in groundwater flow beyond the capacity of the Soap Lake Protective Works and that future permits may be provisioned to minimize the impacts to Soap Lake and the introduction of groundwater to Soap Lake. This further recognizes the important role played by the Soap Lake Protective Works.

- Quinicy-Columbia Basin Irrigation District (Roger Sonnichsen)

Response to 4.2.D

Comment noted.

4.3 Impacts to forestry, including timber harvest, riparian reserves, and wildfire suppression

4.3.A Comment Summary – Concern that this will impact downstream logging practices, including the ability to permit road and culvert replacements.

- Mitchem, Darcy (Green)

4.3.B Comment Summary – General concern over the ability to grow trees on private land.

- Wilson, Howard

Response to 4.3.A – 4.3.B

The proposed ORW designations do not create any additional regulatory requirements for downstream uses. The proposed ORW designations do not impact private landowners' ability to manage private forestland.

4.3.C Comment Summary – Commenters ask if the proposed ORW designation impact US Forest Service management of Riparian Reserves, as defined under the Northwest Forest Plan? What limitations, buffer widths, and equipment limitation zones would be required?

- American Forest Resource Council (Matt Comisky)

Response to 4.3.C

The designation does not impact the US Forest Service management of riparian reserves if they are not polluting Washington's waters. However, if the management of those reserves is causing water quality pollution, then this designation would provide clarity that best management practices defined by the Washington State Department of Ecology would need to be implemented to protect the ORW designation.

4.3.D Comment Summary – Request for an analysis of lands available for timber harvest before and after ORW designation. Commenter asked what effect an ORW designation would have on regional timber supply and forest health.

- Sierra Pacific Industries (John Gold) (Cascade River)

Response to 4.3.D

Lands available for timber harvest within the Mt. Baker-Snoqualmie National Forest area of the Cascade River ORW designation and the Gifford Pinchot National Forest area of the Green River ORW designation remain unchanged by this proposal. An ORW designation does not remove land available for timber harvest. If timber harvest were proposed near an ORW, best management practices would need to be in place to prevent any long-term changes to water quality. As our Rule [Implementation Plan](#) states, “management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met” (p. 10).

4.3.E Comment Summary – How would an ORW designation impact the US Forest Service ability to manage Matrix land allocations within the Mt. Baker-Snoqualmie National Forest and the Gifford Pinchot National Forest, for example for vegetation management and timber harvest, and regeneration harvest within and outside 100 feet of non-fish bearing streams, and within and outside 150 feet of fish bearing streams.

- American Forest Resource Council (Matt Comisky)

Response to 4.3.E

For the Cascade River, the ORW designation boundary does not contain land designated as Matrix along the mainstem or tributary within the Mt. Baker-Snoqualmie National Forest. That land is designated Late-Successional Reserve, which the Northwest Forest Plan defines as land "to be managed to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth related species including the northern spotted owl. These reserves are designed to maintain a functional, interacting, late-successional and old-growth forest ecosystem" (USFS, 1994, C-11). See [Northwest Forest Plan land allocations map](#)¹⁰ for reference.

Land allocated as Matrix is within the proposed Green River ORW. The Rule [Implementation Plan](#) states that "[w]hen conducting land management activities, management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met" (p. 10).

As provided on Page 10 of the Rule Implementation Plan, "The US Forest Service conducts regular maintenance activities on Forest Service land within the proposed ORW boundaries for the Cascade, Green, and Napeequa rivers. These maintenance activities include, but are not limited to, road and trail maintenance, temporary culvert placement, temporary road construction

¹⁰ <https://www.fs.usda.gov/r6/reo/library/downloads/maps/combinedluamap.pdf>

and deconstruction, and invasive species management. Ecology considers these activities temporary actions necessary to protect the public interest as allowed under WAC 173-201A-330(4)(a)."

ORW protections would not prohibit timber harvest. If timber harvest were proposed near an ORW, best management practices would need to be in place to prevent any long-term changes to water quality. As the Rule Implementation Plan states, "management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met" (p. 10).

4.3.F Comment Summary – How will this affect or change forest practices on private land?

- American Forest Resource Council (Matt Comisky)

Response to 4.3.F

The Cascade River ORW boundary contains one 21-acre parcel of private land. The ORW boundaries for the Green and Napeequa rivers do not include private land.

All state waters in Washington are protected by the Clean Water Act and Washington's Water Pollution Control Act (Chapter 90.48 RCW) and Forest activities are specifically addressed under RCW 90.48.420. Under Chapter 90.48 RCW, private landowners and businesses are not allowed to pollute state waters, regardless of an ORW designation. If a private landowner or business needed a permit for an activity that may impact water quality, that activity or discharge must be conducted in manner that would meet water quality standards to protect designated uses, and in the case of possible impacts to a designated ORW, that activity or discharge must also meet the additional requirements of the ORW designation as described in WAC 173-201A-330.

4.3.G Comment Summary – Comments on the impacts to wildfire management, including road construction, thinning and prescribed burning. How does fire management, including roads, get built without additional layering?

- Faubion, Andy
- American Forest Resource Council (Matt Comisky)
- French, Kerry
- Hayden, Larry
- Maahs, Kathy
- Sierra Pacific Industries (John Gold)
- Westergreen, Tom

Response to 4.3.G

This designation would not prevent the US Forest Service from conducting non-commercial fire management activities. We consider fire suppression activities necessary to protect the public interest and allowable under WAC 173-201A-330(4). We have edited the Rule [Implementation Plan](#) to include this activity in the list of example exceptions (see p. 10 "Promoting and Assisting Voluntary Compliance")

4.4 Impacts to recreation

4.4.A Comment Summary – Concerns about how recreation would be impacted, including general access, trails, the Green River Horse Camp, and dispersed camping.

- American Forest Resource Council (Matt Comisky)
- Double O Ranch (Cindy Kleinhuizen)
- Faubion, Andy
- French, Kerry
- Hampton Lumber (Douglas Cooper)
- Hayden, Nathaniel
- Hayden, Larry
- Maahs, Kathy
- Mitchem, Darcy
- Murray, Joseph
- Skamania County Board of Commissioners (Richard Mahar, TW Lannen, Asa Leckie)
- Thompson, Gayle
- Underwood Ranch, LLC (Kurt Underwood)
- Wagoner, Keith (State Senator 39th District)

Response to 4.4.A

This rule does not prohibit or limit common recreational activities in areas of ORW designation. Recreational activities will continue as they have on the federal lands where the waters are located.

National forests have regulations on dispersed camping to protect water from pollution, including a requirement that a campsite must be at least 200 feet from water. Dispersed camping on USFS land would not be impacted by an ORW designation.

4.4.B Comment Summary – What additional requirements would be placed on existing recreational facilities, such as campgrounds, trailheads, and trails, for ongoing maintenance? How would the expansion of existing or the creation of new recreational facilities, listed below, be impacted by a designation? For example campsite, water systems, vault toilets or similar, Parking lots, or New trails?

- American Forest Resource Council (Matt Comisky)
- Mitchem, Darcy (Green)

Response to 4.4.B

The Rule [Implementation Plan](#) provides the following information on allowable actions within an ORW designation: "The US Forest Service conducts regular maintenance activities on Forest Service land within the proposed ORW boundaries for the Cascade, Green, and Napeequa rivers. These maintenance activities include, but are not limited to, road and trail maintenance, temporary culvert placement, temporary road construction and deconstruction, and invasive species management. Ecology considers these activities temporary actions necessary to protect the public interest as allowed under WAC 173-201A-330(4)(a). Ongoing maintenance of established recreational facilities such as campgrounds and trailheads would likewise be categorized under allowable actions.

The Implementation Plan further describes that "when conducting land management activities, management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met."

4.4.C Comment Summary - Are there any existing regulatory requirements related to the recreational/human use of these proposed designated water courses? What existing infrastructure exists to protect water quality from human/recreational uses?

- American Forest Resource Council (Matt Comisky)

Response to 4.4.C

The Rule Regulatory Analyses presents a list of all rules and laws that regulate activity on a waterbody (p.24).

4.4.D Comment Summary - With a heightened designation, some may use this to push to make the Green River system more "natural" overall, which could lead to the closure of the incredibly important Toutle River salmon hatchery. This hatchery provides the only salmon in the entire Toutle system that can be harvested and kept by sport anglers. Another recreational casualty I could foresee is the elimination of trout (lethal removal) in the Mount Margaret area, where their outlets that feed the Green River. These trout were planted years ago, survived the eruption, and are mostly non-native eastern Brook trout. Yes, that fishery isn't a trophy situation and it needs to be managed by the WDFW better, but I can see this rule as an opportunity (excuse) to kill all the trout there and not replace them with native species. If this designation only effects discharge from a MINE or other industrial facility, I'm fine with it, but the trickle down of regulations with unintended casualties that include historic recreational use is unacceptable.

- Mitchem, Darcy (Green)

Response to 4.4.D

An ORW designation for the Green River will not impact the Toutle River Salmon Hatchery, which is not located within the proposed ORW boundary. Further, an ORW designation will not impact recreational uses or the management of existing hatcheries.

4.4.E Comment Summary - Should water quality degrade, especially due to recreational use, what limitations will be placed on the use of the designated segments?

- American Forest Resource Council (Matt Comisky)

Response to 4.4.E

This rule does not prohibit or limit common recreational activities in areas of ORW designation. Recreational activities will continue as they have on the federal lands where the waters are located. All waterbodies that are found to be not meeting water quality standards are required to be placed on the list of impaired waterbodies and scheduled for a water cleanup plan such as a Total Maximum Daily Load study and implementation plan. If such an impairment designation were to occur in waters designated as ORW, the process to clean up this waterbody would follow the same process.

4.5 Impacts to roads, agricultural or other land uses

4.5.A Comment Summary - Are road maintenance, road abandonment, road improvement (specifically including road improvement designed to improve fish passage) activities considered “new” activities and if not would each be allowable under WAC 173-201A-330 (4)? What would be the potential consequences of reduced road maintenance on existing USFS forest roads to achieving or maintain turbidity criteria in WAC 173-201A-200? What would be the consequences of reduced miles of drivable, maintained roads to non-commodity uses such as dispersed recreation and exercise of tribal treaty rights?

- Sierra Pacific Industries (John Gold)

4.5.B Comment Summary - What impacts would a forest landowner, specifically the USFS, expect to see related to road management within watersheds that contain Tier III - ORW designated waters? Would decommissioning of roads near water bodies be allowed and what additional provisions would be required if allowed? Would the use of temporary roads near water bodies be allowed and what additional provisions would be required if allowed? Would construction or reconstruction of water crossings be allowed and what additional provisions would be required if allowed? How would these vary between fish-bearing and non-fish-bearing streams?

- American Forest Resource Council (Matt Comisky)

Response to 4.5.A-4.5.B

We do not anticipate impacts to road management activities by the USFS. Page 10 of the Rule [Implementation Plan](#) explains that "The US Forest Service conducts regular maintenance

activities on Forest Service land within the proposed ORW boundaries for the Cascade, Green, and Napeequa rivers. These maintenance activities include, but are not limited to, road and trail maintenance, temporary culvert placement, temporary road construction and deconstruction, and invasive species management. Ecology considers these activities temporary actions necessary to protect the public interest as allowed under WAC 173-201A-330(4)(a). When conducting land management activities, management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met."

As stated in the Rule Implementation Plan, Ecology is responsible for issuing Section 401 Water Quality Certifications to ensure federal projects that need a federal license or permit meet Washington's water quality standards. To protect designated ORWs from degradation, a Section 401 water quality certification may require conditions that become part of the license or permit.

Federal agencies must ensure that their activities do not cause pollution that violates a state's water quality standards, including the state's antidegradation policy. Some activities may require federal permits. Ecology can assist federal agencies who apply for permits that require Section 401 Water Quality Certifications from Ecology to understand whether that action is within an ORW boundary. The US Forest Service conducts regular maintenance activities on Forest Service land within the proposed ORW boundaries for the Cascade, Green, and Napeequa rivers.

Finally, the state surface water quality standards, including protecting ORWs, apply to all state waters whether they are fish-bearing or not.

4.5.C Comment Summary – What limitations would apply to road maintenance, road construction for permanent roads within Matrix land allocations in the Mt. Baker-Snoqualmie National Forest (for the Cascade River ORW) and the Gifford Pinchot National Forest (for the Green River ORW)?

- American Forest Resource Council (Matt Comisky)

Response to 4.5.C

For the Cascade River, the ORW designation boundary does not contain land designated as Matrix along the mainstem or tributaries within the Mt. Baker-Snoqualmie National Forest. That land is designated Late-Successional Reserve.

Currently, road construction and maintenance should be done without impacting water quality. If there is action on federal lands that is polluting water quality, then we would work with the US Forest Service to put in place best management practices that address the pollution. If these roads need a NPDES permit, then we could condition that federal permit through our 401 certification authority.

4.5.D Comment Summary - We are concerned that this designation could limit the use of lands along this waterway. Currently, there are areas used for livestock pasture near the Cascade River and we want to ensure that their operations are not impeded by this designation or others in the future. This designation could lead to actions that severely limit land uses, including practices related to grazing, farming and timber harvest throughout the areas tributary to these waters.

- Western Washington Agricultural Association (Kara Rowe) (Cascade)

Response to 4.5.D

Agricultural activities such as livestock grazing and farming currently are not allowed to pollute Washington's water. RCW 90.48 states:

“It shall be unlawful for any person to throw, drain, run, or otherwise discharge into any of the waters of this state, or to cause, permit or suffer to be thrown, run, drained, allowed to seep or otherwise discharged into such waters any organic or inorganic matter that shall cause or tend to cause pollution of such waters according to the determination of the department, as provided for in this chapter.”

An ORW designation would not change current requirements.

ORW protections would not prohibit timber harvest. If timber harvest were proposed near an ORW, best management practices would need to be in place to prevent any long-term changes to water quality. As our Rule [Implementation Plan](#) states, "management actions on federal public lands should not degrade water quality and should be conducted so that Washington water quality standards are met" (p. 10).

4.5.E Comment Summary - My concern is that the ORW process, and possible designation might in the end prove to be misguided. From reading the responses submitted so far, there has been no mention of the possible negative impact of the Bureau of Reclamation interception wells that surround the lake. The interception wells prevent mostly fresh area ground water from working its way into the lake, possibly diluting the lake and even under past conditions, flooding the town.

In the 2009 journal article, Hydrological Controls and Freshening in Meromictic Soap Lake, Leo Bodensteiner suggests that interactions between the lake and the pumping are having significant impacts on the layering and the mineral contents of the lake.

Bodensteiner's research implies that primary protection and preservation efforts going forward should focus on the effects pumping rather than secondary sources of degradation such as problematic septic systems, storm sewer runoff, agrichemicals, motorized watercraft, etc.

In the end if Soap Lake receives the ORW designation and the elephant in the room, the pumping issue is not dealt with, then the ORW designation could prove to be misleading and misguided.

- Beckwith, Burr

Response to 4.5.E

Comment noted. We acknowledge that the hydrology and chemistry of Soap Lake is complex and influenced by a variety of environmental and human-caused factors. However, the management of existing Soap Lake Protective Works operations is outside the scope of an ORW designation. A Tier III(B) ORW designation for Soap Lake means that new or expanded activities must follow the regulatory requirements under WAC 173-201A-330.

Soap Lake benefits from an ORW designation by setting quantitative limits on how new anthropogenic (human caused) discharges to the lake can impact lake chemistry.

4.6 Exempted activities

4.6.A Comment Summary – What specific activities would be exempt from environmental review or existing regulations that could potentially impact water quality?

- Hayden, Larry (Green)
- Faubion, Andy
- Maahs, Kathy
- Miller, Barbara
- French, Kerry (Green)

4.6.B Comment Summary - What limitations would a Tier III - ORW designation create for any in-water and/or in-channel work related to the installation of engineered log jams, log placement – including drop and leave strategies, and other habitat enhancement projects?

- American Forest Resource Council (Matt Comisky)

4.6.C Comment Summary - Has the DOE considered that there may be future threatened habitat that might require a strategy that this would prohibit?

- Hayden, Larry (Green)
- Faubion, Andy
- Maahs, Kathy
- French, Kerry (Green)

Response to 4.6.A-4.6.C

As stated in the Rule [Implementation Plan](#) (p. 3), “in some situations, limited degradation of an ORW-designated waterbody may occur if the activity would not result in permanent or long-term lowering of water quality. Those situations are provided under [WAC 173-201A-330\(4\)](#) and include:

- Temporary actions necessary to protect the public interest;
- Treatment work bypasses for sewage, waste, and stormwater when such a bypass is unavoidable to prevent loss of life, personal injury, or severe property damage; and
- Response actions taken in accordance with the Comprehensive Environmental Response Compensation and Liability Act to alleviate a release into the environment of substances which may pose an imminent and substantial danger to public health or welfare.”

In addition, an ORW designation does not protect a waterbody from sources of pollution that come from the air.

Common example activities that may result in temporary water quality degradation, but are allowed under this protection may include, but are not limited to, temporary road and trail

maintenance, temporary road construction and reconstruction, temporary culvert placement, wildfire management activities, and invasive species management. The installation of habitat improvement projects such as engineered log-jams may create temporary water quality degradation but serve to protect the public interest by improving habitat.

Ecology staff are available to provide assistance when requested to review whether a proposed land action could impact an ORW designation.

4.7 Future monitoring

4.7.A Comment Summary – Commenters noted that while salinity [conductivity] is a prime indicator to monitor the health of Soap Lake, other variables should be taken into account, such as composition and volume of the lower lake layer (monimolimnion), and overall lake volume.

- Kovach, Alex (Soap Lake)
- Gorman, Judith, Soap Lake Conservancy (Soap Lake)

4.7.B Comment Summary – Commenter would like to see Ecology add more specific water quality data to monitor Soap Lake, which is available on the Soap Lake Conservancy website, in addition to conductivity.

- Gorman, Judith, Soap Lake Conservancy (Soap Lake)

Response to 4.7.A-4.7.B

We appreciate the information the Soap Lake Conservancy has provided to Ecology on the historical mineral content of Soap Lake. We also appreciate that mineral composition and the volume of the monimolimnion are important characteristics of the lake to monitor.

When considering how to implement Tier III(B) ORW protections to protect the unique lake chemistry from a quantitative measurable change, Ecology relied on consistent, long-term conductivity data that demonstrates a long-term average of lake conditions. While conductivity does not inform us of the relative abundance of specific minerals in the lake, it does inform us of the overall ability of the lake to conduct electricity, which reflects the overall concentration of charged ions such as sodium, calcium, potassium, magnesium, chloride, sulfate, carbonate, and bicarbonate. Many of these charged ions are included in Soap Lake Conservancy’s specific water quality sample data.

4.7.C Comment Summary – Who is responsible for sampling Soap Lake water?

- Kovach, Alex

Response to 4.7.C

This designation does not require sampling for Soap Lake.

4.7.D Comment Summary - The proposed measurable change for Soap Lake is defined as a decrease in conductivity of 639 microsiemens per centimeter ($\mu\text{S}/\text{cm}$) or greater. EPA recommends providing additional clarity as to how this change will be measured.

- US Environmental Protection Agency (Lindsay Guzzo)

Response to 4.7.D

Ecology will evaluate the measurable change of conductivity in the same manner as we currently evaluate measurable change of other water quality parameters, such as temperature and dissolved oxygen. We have added additional language in the [Implementation Plan](#) to demonstrate how Clean Water Act actions, such NPDES permits and Section 401 Water Quality Certifications, will meet the antidegradation requirements.

4.7.E Comment Summary – The Technical Support Document (TSD) states: In addition, human actions are not to cause lake conductivity to decrease below 19,843 $\mu\text{S}/\text{cm}$ as calculated as an annual average more than once in 10 years. This value is based on the combined distribution function of the annual means of conductivity from 1968-2021 and represents the 10th percentile of those means. Annual average conductivity is calculated as the arithmetic average of seven or more samples collected April through October. Samples should be distributed throughout the sampling period.

It seems that this excerpt explains that the long-term average conditions are to be the target conditions. EPA recommends providing a rationale on how this target condition supports the designated uses/unique habitat condition. The rationale should include an explanation of why a seasonal target is protective, and why a separate target is not needed to protect the designated use from November through March.

- US Environmental Protection Agency (Lindsay Guzzo)

Response to 4.7.E

Correct, the long-term seasonal average is the target condition for the system.

Tier III designations are to prevent measurable degradation of waters, and the Tier III(B) designation for Soap Lake only allows for *de minimis* degradation from well-controlled activities. In addition, the target condition long-term for Soap Lake must reflect the current unique properties of Soap Lake. The unique habitat of Soap Lake is its high saline water, and this property is measured via conductivity.

With the available long-term data, we calculated the average conductivity of Soap Lake each year across over five decades worth of data. This provides us a good representation of the range, inter-, and intra-annual variability of conductivity in Soap Lake, and this also represents the unique condition we are protecting. By taking a percentile of the distribution of these values (10th percentile), we establish a value that, should the conductivity measurements in Soap Lake fall below this value more than 10% of the time, then the lake falls outside of the target condition

for the system. In other words, it does not represent the characteristics that were previously identified to be unique in this system.

To put it another way, the 10th percentile of the conductivity distribution represents the value where 10% of all averages in the 1968-2021 dataset fall below said value. Thus, 90% of the time, the annual average for conductivity is higher than this value. We therefore expect the lake long-term to only have an annual average below 19,843 $\mu\text{S}/\text{cm}$ 10% of the time, or once in 10 years, if meeting the target condition. If this occurs more than once in a 10-year period, then there is evidence that the lake is becoming fresher than expected and potentially does not represent the target condition for the system.

We chose to calculate this value using data from April through October only: a seasonal average. There are a few reasons why the seasonal approach was chosen as the target for protection of Soap Lake's unique habitat.

First, higher data variability during the winter months means increased uncertainty in any long-term average conductivity value calculated for Soap Lake, which affects our ability to say that a specific value is protective. Even if we calculated a winter-specific 10th percentile value, we would lack the confidence, due to the inter-annual variation, to state that so long as the system is not below such a value more than once in 10 years, then Soap Lake is still within the target conditions for the system.

Second, Tier III(B) protections are to maintain and protect water quality, including protection from further degradation by humans outside of *de minimis* amounts. The April through October period represents the critical period for Soap Lake, where human impacts considered cumulatively could cause the lake to go below the target condition for the system. This is the agriculture season around the lake and represents the highest risk of freshwater inputs entering the lake due to human actions.

Third, any freshening of the system during the winter months by natural phenomena (e.g., rain events) are short-term impacts to the system, naturally occurring, and vary widely in its intensity between years. If we accounted for these fresher conditions in our overall average calculation, then the resulting 10th percentile criteria value would be lower than 19,843 $\mu\text{S}/\text{cm}$. Ecology believes that this would not be as protective of the unique saline conditions of the system or representative of the lake's long-term conditions to which we want to protect. Thus, by excluding these values, the 19,843 $\mu\text{S}/\text{cm}$ represents a more protective value long-term for Soap Lake.

4.7.F Comment Summary - The use of the term “annual average” seems confusing throughout the rule and supporting documents. Consider using the term “seasonal” or defining annual to clarify that it is only effective from April through October.

- US Environmental Protection Agency (Lindsay Guzzo)

Response to 4.7.F

Ecology recognizes that the term "annual average" may be confusing due to its seasonal application. Ecology rephrased the term to seasonal average to indicate its applicability from April through October.

4.7.G Comment Summary - The proposed designation for Soap Lake contains finite measurable metrics to determine if human activity is impacting water quality. The materials provided by Ecology, and the proponents, do not include any finite measurable metrics to determine if human activity is negatively impacting water quality in the Cascade or Green River drainages. Just anecdotal descriptions of the conditions of the water.

- American Forest Resource Council (Matt Comisky)

Response to 4.7.G

We disagree with the characterization of reports such as National Marine Fisheries Biological Opinions, the US Forest Service Watershed Condition Framework, an Integrated Watershed Assessment for the Toutle Subbasin, and a Department of Ecology water quality report for the Green River, which we used in our analyses and cited in the [Technical Support Document](#), as "anecdotal descriptions of the conditions of the water."

Soap Lake is nominated as an ORW with Tier III(B) protection. This means that human actions cannot cause a measurable change to water quality. Due to Soap Lake's unique water quality, we are establishing a metric to ensure the lake is protected from measurable degradation. It is the unique condition of the Soap Lake that requires this metric; whereas, numeric criteria and metrics already exist for waterbodies that exhibit more common aquatic life uses based on fish and other species. Soap Lake does not meet high water quality standards by these conventional measures, such as temperature and dissolved oxygen. Soap Lake also contains naturally-derived levels of toxic chemicals above water quality standards. Therefore, to protect the unique qualities of the lake, we used long term conductivity data to understand the level of salts in the lake over a long period of time. We calculated what would be defined as a "measurable change" from that baseline information and included it in the rule.

Because the Cascade, Green, and Napeequa rivers are proposed as Tier III(A) waters, no degradation in water quality, based on more conventional measures, is allowed. Further, these waters are considered high quality by conventional measures, and any activity that may be proposed on those waters that would result in a discharge to the water would have to demonstrate that water quality would not be impacted as result.

4.7.H Comment Summary – Commenter asked what entity will be responsible for monitoring of water quality of the designated waters. What is the frequency of, and cost associated with this monitoring?

- American Forest Resource Council (Matt Comisky)

4.7.I Comment Summary – What data will be used for a baseline to determine if there are any changes in the future?

- American Forest Resource Council (Matt Comisky)

Response to 4.7.H-4.7.I

Water quality standards are applicable to all state waters. The ORW designation, and the additional numeric criteria, do not require any specific monitoring data to track conditions. Some data collection, analysis, and possible modeling may be necessary to allow a permitted action to occur as with any waterbody. But, as with all water quality standards, monitoring of general water quality conditions occurs when there are concerns that conditions are changing or water quality is being impacted.

Baseline data are only necessary when considering the impact of an action that may impact water quality. The entity proposing such an action would be responsible for providing that information at the time of approval for the authorizing entity. General baseline data is not required for any particular water quality standards of any designated uses; however, federal, state, local, and others often monitor waters of interest for a determination of conditions of waters of interest.

5. Miscellaneous

This section addresses comments we received that do not directly apply to this rulemaking.

5.1. General Antidegradation comments

5.1.A Comment Summary - Can a natural disaster affect how the DOE will interpret the antidegradation policy?

- Faubion, Andy
- French, Kerry
- Hayden, Larry
- Maahs, Kathy
- Miller, Barbara

Response to 5.1.A

Ecology's antidegradation policy protects existing water quality from human-caused sources of pollution.

5.1.B Comment Summary – Can this antidegradation policy change?

- Faubion, Andy
- French, Kerry
- Hayden, Larry
- Maahs, Kathy

Response to 5.1.B

Ecology regularly reviews the surface water quality standards and updates them as needed based on public feedback, to reflect new science, and to be consistent with federal requirements.

Changes to the surface water quality standards must also be approved by the EPA before they can be used for Clean Water Act purposes, such as for National Pollutant Discharge Elimination System permits. Changes made to the antidegradation policy may be made if a need is identified and through a public process in accordance with the Washington State Administrative Procedures Act (Chapter 34.05 RCW).

5.1.C Comment Summary – I like water, I'm not sure what this is about though.

- Masterson, Ryan

5.1.D Comment Summary – Please act in a careful and thoughtful way so we citizens can live and be and enjoy and pleasure in living here.

- Johnson, Lorraine

Response to 5.1.C-5.1.D

Comments noted.

5.2 Tier II vs Tier III

5.2.A Comment Summary – Ecology is inconsistently treating Tier II and Tier III waterbodies. In the context of State Forest Practices Regulation, WDOE has recently been misusing its Tier II regulation to preclude measurable change in waters which have been demonstrated to meet numeric criteria in state standards. This appears indistinguishable from requirements under Tier III (such as proposed for the Cascade River) implying there is no practical difference between how Tier I, II, and III of the Antidegradation Policy is being administered: this is clearly not the intent of the rules and a departure from the plain language therein.

Please clarify the present antidegradation policy and requirements under Tier II and contrast with the policy and requirements under Tier III. Which specific land management activities that are currently permissible within a Tier II water would be precluded under a Tier III designation?

- Sierra Pacific Industries (John Gold)

Response to 5.2.A

Tier I protections are those set in numeric and narrative criteria to establish thresholds for water pollution. These are the minimum conditions to meet designate use requirements. This is different than antidegradation Tier II. Tier II protection is applicable to all waterbodies that exhibit a condition better than that required for Tier I numeric and narrative criteria protections. This higher water quality can be for one or more conditions, such as very low metal concentrations, very high dissolved oxygen conditions, or cooler water conditions. These higher water quality conditions may also be present only in some seasons but nonetheless are protected by Tier II of the water quality standards. Actions that may reduce high water quality to lower water quality conditions (yet still above Tier I conditions as required) are allowed only if in the overriding public interest. Tier III water do share similar requirements as Tier II; however, some ORW designations do not allow a consideration of overriding public interest for the lowering of

water quality. Ecology has interpreted the application of these tiers of protection consistent with EPA guidance and through formal rule adoption approval from EPA.

Land activities may or may not have any effect on water quality. Each land activity must be evaluated separately given the location and the action. Ecology cannot provide all possible scenario of conditions; rather, we can only provide the rules and guidance that differentiates the review requirements for the specific designation of Tier III waters. All other waters are protected by both Tier I and Tier II protections. Tier I protections are the water quality numeric and narrative criteria, and Tier II guidance is provided through our permit writers manual.

5.2.B Comment Summary – Ecology is misapplying Tier II Antidegradation Policy, or other comments about Forest Practices Applications.

- Ballard, Brian
- Button, Nancy
- Citizen Action Defense Fund (Jackson Maynard)
- Cowdrey, Lori
- Eidsness, Deborah KB
- Faubion, Andy
- Finch, Indra
- French, Kerry
- Frey, Donald
- Hampton Lumber (Douglas Cooper)
- Hanson, Richard
- Hayden, Larry
- Hennig, Jason
- Hogeweide, Ted
- Knight, Mary
- Knudsen, Elizabeth
- Leggett, BJ
- Lund, Traci
- M Long, Teresa
- Maahs, Kathy
- MacPherson, Darcy
- Meier, Robert
- Miller, James
- Mitchell, Cindy (Washington Forest Protection Association)
- Nyborg, Julie
- O'Haegher, Kyra
- Rayonier (Holli Johnson)
- Saltvick, Brian
- Sierra Pacific Industries (John Gold) (Cascade River)
- Underwood Ranch, LLC (Kurt Underwood)
- Washington Forest Protection Association (Darin Cramer)
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to 5.2.B

Tier II is not applicable to this rulemaking. This rulemaking designates ORWs under WAC 173-201A-330. Tier II – Protection of High-Quality Waters is described under WAC 173-201A-320.

5.3 Future ORW proposals

5.3.A Comment Summary – Comments that this opens the door for future nominations, or questions on how this will impact future ORW nominations.

- Chelan County (Mike Kaputa)

- American Exploration & Mining Association (Sidney Smith)
- Skamania County Board of Commissioners (Richard Mahar, TW Lannen, Asa Leckie)

Response to 5.3.A

The protection of waters of higher quality have been included in the state surface water quality standards (SWQS) in compliance with the Federal Pollution Control Act since the 1970s. For example, previous antidegradation rules did not allow any degradation of waters “lying in national parks, national recreation areas, national wildlife refuges, national scenic rivers, and other areas of national ecological importance” (SWQS, WAC 173-201-035(8), 1977). Since then, greater specificity has been added to the SWQS to provide a process to specifically identify waters for this highest level of protection, Tier III. Although the ability for the agency or the public to identify waterbodies to designate as Tier III has existed since early versions of the SWQS, Washington, following EPA guidance as did many other states during this time, further detailed the process in 2003 to identify waters to be considered for Tier III. The opportunity to nominate a waterbody remains unchanged with this rulemaking and has no bearing on further nominations. All nominations for Tier III waterbodies are and will be evaluated on their own merit.

Any nomination for an ORW must present information that demonstrates how that waterbody meets one or more of the eligibility criteria listed under WAC 173-201A-330(1). If Ecology determines the information sufficiently demonstrates eligibility, we will schedule a review of the nominated water for designation as an ORW. The review includes a public process and consultation with Tribes.

5.3.B Comment Summary –Commenters raised concerns about this rule expanding use of Ecology authority or setting a precedent for overreaching in other waters.

- | | |
|--|---|
| • Knight, Mary | • Hogeweide, Ted |
| • Ballard, Brian | • Ketcham, Terry W. |
| • Bonagofsky, Jerry | • Kittitas County (Cory Wright) |
| • Button, Nancy | • Knudsen, Elizabeth |
| • Champeaux, Tina | • Leggett, BJ |
| • Citizen Action Defense Fund
(Jackson Maynard) | • Lund, Traci |
| • Cowdrey, Lori | • Long, Teresa M |
| • Eidsness, Deborah KB | • MacPherson, Darcy |
| • Finch, Indra | • Meier, Robert |
| • Frey, Donald | • Miller, James |
| • Fry, Blade | • Miller, Ken and Bonnie |
| • Hampton Lumber (Anjolene Ngari) | • Mitchell, Cindy (Washington Forest
Protection Association) |
| • Hampton Lumber (Douglas Cooper) | • Nyborg, Julie |
| • Hanson, Richard | • O'Haegher, Kyra |
| • Hennig, Jason | • Saltvick, Brian |

- Stargell, Aubrey
- Stienbarger, Doug
- Underwood Ranch, LLC (Kurt Underwood)
- Washington Forest Protection Association (Darin Cramer)
- Wood, Glen
- Woods, Cheryl
- Woods, Mike

Response to 5.3.B

We disagree that this is an expanded use of Tier III. We are proposing Tier III protections based on eligibility criteria that were publicly reviewed and adopted in state rule in 2003. We recognize that even though the ability for anyone to nominate an ORW for protection has been available since 2003, this is the first time many are learning about it. That is one of the key reasons why Ecology conducted extensive outreach to connect with communities that could be affected by this rulemaking.

While it is possible that other ORWs could be designated, they first must be nominated, and Ecology would need to determine that they meet the eligibility criteria listed under WAC 173-201A-330(1). After that, we would go through the formal rulemaking process before any designation could occur.

5.4 Tier II ½

5.4.A Comment Summary - As a reminder EPA views Tier III(B) as Tier 2.5 (see language from R10's May 2, 2007 action letter below). Tier III prohibits degradation, so having a Tier III category that allows degradation can be a bit confusing. EPA's forthcoming WQS Handbook will have a discussion on Tier 2.5 that would support WA's choice to have such a category in the Tier 2 section. EPA suggests revising this section accordingly in a future rulemaking.

Excerpt from EPA's May 2, 2007 action letter:

Washington's provision also contains a Tier III(B), which allows de minimis degradation. This tier is analogous to a "Tier II ½", which is a more stringent application of the Tier II provisions of the antidegradation policy but slightly less stringent than the prohibition against any lowering in Tier III (A). This extra tier in the State's antidegradation policy is acceptable because it is a more stringent application of the Tier II provisions of the antidegradation policy, and therefore, permissible under Section 510 of the Clean Water Act (Water Quality Standards Handbook: Second Edition, EPA-823-B-94-00Sa, August 1994).

- US Environmental Protection Agency (Lindsay Guzzo)

Response to 5.4.A

Comment noted.

5.5. Incomplete or empty comments

- Anonymous, John
- Belle, Maureen

- Tester, John

Appendix A: Citation List

**Chapter 173 – 201A WAC
Water Quality Standards for Surface Waters of the State of Washington: Outstanding
Resource Waters
AO # 22 – 06**

This citation list contains references for data, factual information, studies, or reports on which the agency relied in the adoption for this rule making (RCW 34.05.370(f)).

At the end of each citation is a number in brackets identifying which of the citation categories below the sources of information belongs. (RCW 34.05.272).

Table 1 Citation Categories

Citation Categories	
1	Peer review is overseen by an independent third party.
2	Review is by staff internal to Department of Ecology.
3	Review is by persons that are external to and selected by the Department of Ecology.
4	Documented open public review process that is not limited to invited organizations or individuals.
5	Federal and state statutes.
6	Court and hearings board decisions.
7	Federal and state administrative rules and regulations.
8	Policy and regulatory documents adopted by local governments.
9	Data from primary research, monitoring activities, or other sources, but that has not been incorporated as part of documents reviewed under other processes.
10	Records of best professional judgment of Department of Ecology employees or other individuals.
11	Sources of information that do not fit into one of the other categories listed.

- American Whitewater. 2022. Cascade Marble Creek Campground to Bridge nr. Skagit Confluence. <https://www.americanwhitewater.org/content/River/view/river-detail/2077/main> [11]
- Anchor QEA, LLC. (2014). City of Soap Lake Draft Shoreline Master Program. Prepared for Grant County and Soap Lake. August 2014. [8]
- Anderson, G. C. (1958). Seasonal Characteristics of Two Saline Lakes in Washington. *Limnology and Oceanography*, 3, doi: 10.4319/lo.1958.3.1.0051. [1]
- Anderson, R. Y., Dean, W. E., Bradbury, P., Love, D. (1985). Meromictic Lake and Varved Lake Sediments in North America. U.S. Geological Survey Bulletin 1607. p. 14-18. [1]
- Begemann MB, Mormile MR, Sitton OC et al. (2012). A streamlined strategy for biohydrogen production with *Halanaerobium hydrogeniformans*, an alkaliphilic bacterium. *Front Microbiology* 2012;3:93. [1]
- Bendixen, M. (2021, July 21). A Mount St. Helens ecologist spent his life researching the volcano. Science is reaping the rewards. OPB. <https://www.opb.org/article/2021/07/21/scientists-reaping-rewards-of-ecologist-mount-st-helens-work/> [11]
- Bennett, WAG. (1962). Saline lake deposits in Washington. In Washington Division of Mines and Geology Bulletin 49, 129 p. [9]
- Boyd W. Sean, Nik Clyde, Andre' Breault, Robbie Di Paolo, Malcolm McAdie. (2021). Abundance, Distribution and Migration Patterns of North American Eared Grebes (*Podiceps nigricollis*). *Waterbirds*, 44(1), 76-85. [1]
- Bureau of Land Management. 2012. Goat Mountain Hardrock Prospecting Permit Applications Environmental Assessment. June 28, 2012, Modified December 17, 2015. Portland, OR. https://eplanning.blm.gov/public_projects/nepa/52147/66795/72638/Goat_Mountain_ME_A_20151217_FINAL.pdf [4]
- Bureau of Reclamation (n.d.) *Columbia Basin Project*. <https://www.usbr.gov/projects/index.php?id=438> [11]
- Bureau of Reclamation. (1976). Transfer Report and Report of Joint Inspection in Connection with the Transfer of Operation and Maintenance Responsibilities of Bureau Constructed Works, Special Reserved Works (Quincy District) to the Quincy-Columbia Basin Irrigation District. Boise, Idaho. [8]
- Central Washington University. (2013, February 22). Roadside Geology – Dry Falls [Video file]. YouTube. <https://www.youtube.com/watch?v=DFLFDCZaqL8> [11]
- City of Castle Rock. (2020). Annual Drinking Water Quality Report 2020. Castle Rock Water System. Castle Rock, Washington. <https://www.ci.castle-rock.wa.us/public.htm> [9]

- City of Kelso. (2021). 2021 Water Quality Report. Kelso, Washington.
<https://www.kelso.gov/document/water-quality-report-2021> [9]
- City of Soap Lake Comprehensive Plan 2021. (2022). Prepared by Plan It Consulting, Ellensburg, Washington. [2021+CompPlanUpdate.pdf \(squarespace.com\)](#) [8]
- Coeur d'Alene Audubon Society. (2013). Bird of the Month September 2012 – Eared Grebe.
<http://www.cdaudubon.org/Birds%20of%20the%20month%202012-2013.html> [9]
- Confederated Tribes of the Colville Reservation. (2021). Confederated Tribes of the Colville Reservation: A Brief History. June 16, 2021.
<https://storymaps.arcgis.com/stories/bb31cd48d0284fa59d6f454cafabe962> [11]
- Confederated Tribes of the Colville Reservation (2021). Colville Business Council Resolution Index. March 4, 2021.
<https://static1.squarespace.com/static/572d09c54c2f85ddda868946/t/60418e325d59c90d8abe0358/1614908979097/Resolution+Index+03-04-2021.pdf> [11]
- Department of Ecology. (1993). Lake Water Quality Assessment Program. Publication no. 96-304. January 1996. Olympia, WA.
<https://apps.ecology.wa.gov/publications/SummaryPages/96304.html> [2]
- Dimitriu, P. A., Pinkart, H. C., Peyton, B. M., & Mormile, M. R. (2008). Spatial and temporal patterns in the microbial diversity of a meromictic soda lake in Washington State. *Applied and Environmental Microbiology*, 74(15), 4877-4888.
<https://journals.asm.org/doi/full/10.1128/AEM.00455-08> [1]
- Edmondson, W. T., Anderson, George C. (1965). Some features of saline lakes in Central Washington. *Limnology and Oceanography*, 10, doi: 10.4319/lo.1965.10.suppl2.r87. [1]
- eBird. (2021). eBird: An online database of bird distribution and abundance. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: <http://www.ebird.org>. Accessed: February 3, 2023. [9]
- Fairbanks, K. (2022, February 8). Mining exploration near Mount St. Helens blocked after judge vacates decisions allowing permits. *The Chronical*.
<https://www.chronline.com/stories/mining-exploration-near-mount-st-helens-blocked-after-judge-vacates-decisions-allowing-permits.284234> [11]
- Friedman, I., and Redfield, A. C. (1971). A Model of the Hydrology of the Lakes of the Lower Grand Coulee, Washington. *Water Resources Research*, 7(4), 874– 898.
doi:[10.1029/WR007i004p00874](https://doi.org/10.1029/WR007i004p00874) [1]
- Gray and Osborne, Inc. (2019). City of Soap Lake Mineral Water Systems Plan. December 2019.
<https://static1.squarespace.com/static/5d56f8fab78e1e000183cba4/t/5e470ea899b324611d5b402c/1581715126179/Mineral+Water+System+Plan+%28Part+1%29.pdf> [11]

- Kallis, J., Bodensteiner, L. and Gabriel, A. (2010). Hydrological Controls and Freshening in Meromictic Soap Lake, Washington, 1939-2002. *JAWRA Journal of the American Water Resources Association*, 46: 744-756. <https://doi.org/10.1111/j.1752-1688.2010.00446.x> [1]
- Kiefer, K. [Kathleen Kiefer]. (2013, May 15). Barbara Aripa - Colville Tribe talks about Soap Lake [Video]. YouTube. https://www.youtube.com/watch?v=5QLF_waV7Vg [11]
- Lower Columbia Fish Recovery Board. (2010a). WA Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan. Vol. II – Ch. I Toutle Subbasin. May 2010. [8]
- Lower Columbia Fish Recovery Board. (2010b). WA Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan. Appendix E: Integrated Watershed Assessment. May 2010. [8]
- The Mountaineers (2023). Napeequa Valley. Accessed Jan 2023. <https://www.mountaineers.org/activities/routes-places/napeequa-valley> [11]
- National Marine Fisheries Service. 2018. Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and management Act Essential Fish Habitat Response. ESA Section 4(d), Limit 6, determination for the Skagit River steelhead fishery Resource Management Plan (RMP), as submitted by the Sauk-Suiattle Indian Tribe, Swinomish Indian Tribal Community, Upper Skagit Indian Tribe, Skagit River System Cooperative, and the Washington Department of Fish and Wildlife (WDFW) NMFS consultation number: WCR-2017-7053. April 11, 2018. [8]
- National Parks Service. 2016. National Rivers Inventory. <https://www.nps.gov/subjects/rivers/washington.htm> [11]
- National Weather Service. (2023). NOAA Online Weather Data. Monthly total precipitation for Ephrata Airport, WA. 1949-2022. [Climate \(weather.gov\)](https://www.weather.gov). Accessed February 7, 2023. [9]
- National Wild and Scenic Rivers System (2019). About the Wild and Scenic Rivers Act – River Classification. <https://rivers.gov/wsr-act.php> [11]
- Northwest Power and Conservation Council (2023). Protect Areas/Stream Map Viewer. <https://www.nwcouncil.org/fish-and-wildlife/fw-topics/protected-areas/> [11]
- Paul, Varun & Mormile, Melanie. (2017). A case for the protection of saline and hypersaline environments: a microbiological perspective. *FEMS microbiology ecology*. 93. 10.1093/femsec/fix091. [1]
- Peyton, B. M., and Yonge, D.R. (2002). Biodegradation of Non-Point Source Pollutants in Soap Lake, Washington. Project Completion Report. State of Washington Water Research Report WRR-11. Pullman, WA: State of Washington Water Research Center. [9]

- Pinkart, HC, Simonsen B., Peyton, B., Mormile, M. (2006). The Sulfur cycle in a permanently meromictic haloalkaline lake. Proc. SPIE 6309, Instruments, Methods, and Missions for Astrobiology IX, 63090M (14 September 2006). <https://doi.org/10.1117/12.680902> [1]
- Quincy-Columbia Basin Irrigation District (QCBID). (2022). Annual Activities Report of the Soap Lake Protective Works. Quincy-Columbia Basin Irrigation District. Letter to Washington State Department of Ecology dated June 10, 2022. [9]
- Recreation.gov. (2023). Mineral Park Campground. <https://www.recreation.gov/camping/campgrounds/233891>[11]
- Rice, C. A., Tuttle, M. L., & Briggs, P. H. (1988). Sulfur speciation, sulfur isotopy, and elemental analyses of water-column, pore water, and sediment samples from Soap Lake, Washington (No. 88-22). US Geological Survey. <https://pubs.usgs.gov/of/1988/0022/report.pdf> [1]
- Skagit River System Cooperative and Washington Department of Fish and Wildlife. (2005). Skagit Chinook Recovery Plan. <http://skagitcoop.org/> [8]
- Soap Lake Conservancy. (2023). Healing waters “Sanitorium” history. <https://www.thelake.org/uniqueLake/sanitoriumtown>
- Sorokin DY, Foti M, Pinkart HC, Muyzer G. (2007) Sulfur-oxidizing bacteria in Soap Lake (Washington State), a meromictic, haloalkaline lake with an unprecedented high sulfide content. *Applied Environmental Microbiology*. 73(2), 451-5. doi: [10.1128/AEM.02087-06](https://doi.org/10.1128/AEM.02087-06). [1]
- Special Areas; Roadless Area Conservation. 2021. 66 Fed. Reg. 3243. January 12, 2001. [7]
- State of California Water Resources Control Board (1994). Mono Lake Basin Water Rights Decision 1631: Decision and order amending water right licenses to establish fishery protection flows in streams tributary to Mono Lake and to protect public trust resources at mono lake and in the mono lake basin. September 28, 1994. [6]
- USDA Forest Service (2002) Northwest Forest Plan Land Allocations, 2002. <https://www.fs.usda.gov/r6/reo/library/downloads/maps/combinedluamap.pdf> [8]
- USDA Forest Service (2000) Mt. Baker Snoqualmie National Forest Inventoried Roadless Areas Map. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsmrs_072459.pdf [8]
- US Forest Service. 1994. Record of Decision for Amendments to Forest Service and Bureau of Land management Planning Documents Within the Range of the Northern Spotted Owl. [8]
- USDA Forest Service (1994) Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl. [8]

- USDA Forest Service. (1990). Final Environmental Impact Statement: Land and Resource Management Plan, Wenatchee National Forest. Appendix E: Wenatchee National Forest Wild and Scenic River Analysis 1990. Forest Service, Region 6 Wenatchee, WA. February, 1990. [8]
- USDA Forest Service (1979). Final Environmental Statement Roadless Area Review and Evaluation. January 1979.
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5116928.pdf [8]
- U.S. Geological Survey (USGS). (2023) National Water Information System: Web Interface: USGS Monthly Statistics for the Nation: USGS 12182500 Cascade River at Marblemount, WA. Accessed May 2023. <https://waterdata.usgs.gov/monitoring-location/12182500/#parameterCode=00010F&period=P7D> [9]
- U.S. Geological Survey (USGS). (2023) National Water Information System: Web Interface: USGS Monthly Statistics for the Nation: USGS 14240525 Toutle River Below Srs Near Kid Valley, WA. Accessed May 2023. <https://waterdata.usgs.gov/monitoring-location/14240525/#parameterCode=00065&period=P7D> [9]
- U.S. Geological Survey. (2019). Specific conductance: U.S. Geological Survey Techniques and Methods, book 9, chap. A6.3, 15 p., <https://doi.org/10.3133/tm9A6.3> . [Supersedes USGS Techniques of Water-Resources Investigations, book 9, chap. A6.3, version 1.2.] [8]
- U.S. Geological Survey. (1985). Meromictic Lakes and varved lake sediments in North America. US Geological Survey Bulletin 1607. p.14-18 <https://pubs.usgs.gov/bul/1607/report.pdf> [9]
- University Of Missouri-Rolla. (2004, May 25). Biologists Uncover New Genus Of Bacteria In Washington Lake. *ScienceDaily*.
www.sciencedaily.com/releases/2004/05/040525063445.htm [11]
- Walker, K. F., (1974), The stability of meromictic lakes in central Washington, *Limnology and Oceanography*, 2, doi: [10.4319/lo.1974.19.2.0209](https://doi.org/10.4319/lo.1974.19.2.0209). [1]
- Washington Department of Ecology. 2002. Second Screening Investigation of Water and Sediment Quality of Creeks in Ten Washington Mining Districts, with Emphasis on Metals. Publication 02-03-024. Olympia, Washington. June 2002. [2]
- Washington Department of Fish and Wildlife (2023b). Priority Habitat and Species Maps.
<https://geodataservices.wdfw.wa.gov/hp/phs/> [9]
- Washington Department of Fish and Wildlife (WDFW). (2023a). SalmonScape.
<https://apps.wdfw.wa.gov/salmonscape/map.html> [9]
- Washington Department of Fish and Wildlife. (2013). Recommendations for Wild Steelhead Gene Banks in the Lower Columbia River. WDFW Region 5 Fish Program. November 25, 2013. [8]

Washington Trails Association (2023). Hiking Napeequa River. <https://www.wta.org/go-hiking/hikes/napeequa-river> [11]

Washington Trails Association. 2023. Hidden Lake Lookout. <https://www.wta.org/go-hiking/hikes/hidden-lake-lookout> [11]

Washington Trails Association (2011). Featured Landscape – Napeequa Valley. Washington Trails Magazine. Oct. 2011. <https://www.wta.org/news/magazine/magazine/napeequa-valley> [11]

Appendix B List of Commenters

Table 1. All commenters and the respective topics the person or organization's comments pertained to. "Topic Code" field indicates the section of this document the reader can find the comment. Note: In some situations, there were multiple comments submitted by a commenter that provided only a first or last name where we were unable to tell if these were one or multiple distinct commenters. Those comments are summarized under the single name provided, with all relevant topics provided. (For example: "Amy").

Commenter	Comment Topic
A, Garcia	1.1.B
A, L	1.1.B
A, Lena	1.1.B
A, Natalya	1.1.B
A, Rimona	1.1.B
A, Roman	1.1.B
Ab, nando	1.1.A
Abigail	1.1.B
Abramson, Mary Ann	1.1.B
Ackerman, Laura	1.1.B
Adams, Marsha	1.1.A
Adams, Michelle	1.1.B
Adichek, Oleg	1.1.B
Adina	1.1.A
Adrian	1.1.A
Agoshkov, Lucy	1.1.B
Aguirre, Maria	1.1.A
Aiken, Randi	1.1.A
Akimov, Eduard	1.1.B
Akimov, Natalya	1.1.B
Akins, Judith	1.1.C
Alaniz, David	1.1.B
Alder, John	1.1.A
Aldna, Kvivchkova	1.1.B
Aldrich, Sandi	1.1.A
Aleksey, Polikarpov	1.1.B
Alex, R	1.1.B
Alexander, Maria	1.1.B
Alexander, Val	1.1.D
Alford, Jeff	1.1.A
Aliment, Dean	1.1.B
Alley, Della	1.1.B
Allison, Melana	1.1.B
Alspach, Ken	1.1.A
Amara, Mark	1.1.B
Amaya, Anna	1.1.B
Ambre, Erin	1.1.A
American Exploration and Mining Association (Sidney Smith)	2.1.J, 2.3.B, 2.3.J, 5.3.A

Commenter	Comment Topic
American Forest Resource Council (Matt Comisky)	2.1.F, 2.1.G, 2.1.J, 2.2.A, 2.2.C, 2.2.D, 2.3.A, 2.3.G, 2.3.H, 2.4.B, 3.1.A, 3.3.D, 4.3.C, 4.3.E, 4.3.F, 4.3.G, 4.4.A, 4.4.B, 4.4.C, 4.4.E, 4.5.B, 4.5.C, 4.6.B, 4.7.G, 4.7.H, 4.7.I
Amieux, Paul	1.1.B
Amino, Kaitova	1.1.B
Amy	1.1.A
Anastasiia	1.1.B
Anderson, Debra	1.1.B
Anderson, Ellen	1.1.C
Anderson, Kevin	1.1.A
Anderson, Lyle	1.1.A
Andrade, Becky	1.1.A
Andrews, Kaylee	1.1.A
Andrii, Polinko	1.1.B
Andriyuk, Tamara	1.1.B
Andrves, Scott	1.1.B
Andy	1.1.B
Angela, Christie	1.1.B
AnnaLaurie	1.1.A
Anonymous	1.1.A, 1.1.B, 2.1.J
Antoinette	1.1.A
Antouov, Y	1.1.B
Antush, Philip	2.1.J
Apresovna, Avanesyan	1.1.B
Aquino, Joshualyn	1.1.A
Aquino, Joyce	1.1.A
Argat, Andrei	1.1.B
Arnautod, Michael	1.1.B
Arriss, William	1.1.B
Artem, Polishuk	1.1.B
Artenga, Kevin	1.1.B
Aryal, Riya	1.1.A
Association of Consulting Foresters	2.1.G, 2.2.D
Atkinson, Martha	1.1.A
Atkinson, Suellen	1.1.B
Aubertin, Pat	1.1.B
Avdeev, Uglin	1.1.B
Ayers, Kristy	1.1.B
Ayropetyzan, Artur	1.1.B

Commenter	Comment Topic
Ayuso, Siabhon	1.1.A
Azul	1.1.B
B	1.1.B
B, A	1.1.B
B, Alex	1.1.B
B, Andrei	1.1.B
B, Anna	1.1.B
B, Aydrey	1.1.B
B, Brian	1.1.B
B, E	1.1.B
B, Erika	1.1.B
B, Inna	1.1.B
B, J	2.1.G, 2.1.J, 2.2.D
B, Jennifer	1.1.B
B, Mike	1.1.B
B, Olga	1.1.B
B, Russ	1.1.B
B, Ryszovde	1.1.B
B, Sarah	1.1.B
B, Svetlana	1.1.B
B, V	1.1.B
B, Vera	1.1.B
B, Y	1.1.B
Babak, Anatoly	1.1.B
Babak, Dima	1.1.B
Babak, John	1.1.B
Babak, Julia	1.1.B
Babak, M	1.1.B
Babar, Paul	1.1.B
Babek, Ivan	1.1.B
Bable, Tim	1.1.B
Baer, Richard	1.1.A
Bagaveyev, Salikh	1.1.B
Bahr, Dennis	1.1.A
Bailey, Stephen	1.1.A
Baird, Peter	1.1.A
Baker, Marcia	1.1.B
Baker, Norman	1.1.A
Baker, Randy	1.1.B
Baker, Terrie	1.1.B

Commenter	Comment Topic
Baker-Jagla, Deborah	1.1.B
Bakke, Susan	1.1.A
Balhayer, Viktor	1.1.B
Balhayeva, V	1.1.B
Ballard, Brian	2.1.G, 2.1.J, 5.2.B
Baller, Gretchen	1.1.D
Ballinger, Susan	1.1.E
Bambcela, Larisa	1.1.B
Banar, Oleg	1.1.B
Barbara	1.1.A
Barcott, Nick	1.1.A
Barduhn, Ann	1.1.B
Bare, Bruce	2.1.F, 2.1.J, 2.2.A, 3.1.A
Barney, Cameron	1.1.B
Barney, Dori	1.1.B
Barry	1.1.A
Bartley, William	1.1.A
Bartow, Sally	1.1.A
Bascom, Anna	1.1.A
Bass, Travis	1.1.A
Baty, Andrew	1.1.B
Bauker, Thomas	1.1.B
Bauman, Sarah	1.1.A
Bazyuk, Abby	1.1.B
Bazyuk, David	1.1.B
Bazyuk, Otes	1.1.B
Beasley, George	1.1.A
Beasley, Melinda	1.1.B
Beatty, Danny	1.1.A
Beaty, Caylen	1.1.A
Beauman, Richard	1.1.A
Beckham, Mande	1.1.B
Beckwith, Burr	4.5.E
Beckwith, E	1.1.B
Behle, Brian	1.1.A
Beldin, Joan	1.1.A
Bell, Belina	1.1.B
Belle, Maureen	5.5
Belyaev, Valery	1.1.B
Benbow, Debra	1.1.B

Commenter	Comment Topic
Bendickson, Constance	1.1.B
Benedict, Derek	1.1.A
Benham, Rebekah	1.1.A
Bennett, Barb	1.1.B
Benrch, Cheryl	1.1.B
Bentley, Ginger	1.1.B
Bentzel, Jen	1.1.A
Beregorg, Valentina	1.1.B
Berg, Barney	1.1.B
Berg, Georganne	1.1.B
Berg, Mackenzie	1.1.A
Bergstrom Falendysz, Heather	1.1.A
Bernal, Paul	1.1.A
Berrman, Doug	1.1.B
Berryman, Cassie	1.1.B
Berryman, Zac	1.1.B
Bertash, Vlad	1.1.B
Bertram, Trey	1.1.A
Bessarab, Diana	1.1.B
Bessarab, E	1.1.B
Bessarab, Elena	1.1.B
Betzer, Ethan	1.1.B
Bibokub, V	1.1.B
Bickle, Barbara	1.1.B
Bikhnyk, Karina	1.1.B
Billings, Lisa	1.1.A
Billings, Suzanne	1.1.A
Bilodeau, Dava	1.1.B
Bilodeau, Jadon	1.1.B
Bilogin, Svitlana	1.1.B
Bishop, Heather	1.1.B
Bishop, M. Kay	1.1.B
Bivins, Michele	1.1.A
Bjork, Ritz	1.1.B
Black, Laurel	2.4.A, 2.4.C
Blackwood, Barbara	1.1.A
Blalock, Tamara	1.1.B
Bledsoe, Brenda	1.1.B
Blitzer, Mark	1.1.A

Commenter	Comment Topic
Bly, Comett	1.1.B
Board of Clallam County Commissioners (Randy Johnson)	2.2.D, 3.1.A
Boaterre, Qat	1.1.A
Bob	1.1.A
Boesel, Pat	1.1.B
Boler, Marguerite	1.1.A
Bonagofsky, Jerry	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.3.F, 2.4.A, 2.4.C, 3.1.A, 5.3.B
Bondarenko, Alex	1.1.B
Bondarenko, Lilly	1.1.B
Bondarenko, Valerie	1.1.B
Bondarenko, Victor	1.1.B
Bordac, Olga	1.1.B
Borg, Nels	1.1.B
Borisov, Anna	1.1.B
Borisov, Vlad	1.1.B
Borovik, A	1.1.B
Borovik, Alla	1.1.B
Borovik, Andrey	1.1.B
Borovik, Roza	1.1.B
Borozdin, David	1.1.B
Boryshkevych, Yelena	1.1.B
Bouton, Vedille	1.1.A
Bowers, Richard	1.1.A
Boyd, Wade	2.1.J, 2.2A, 2.2.D
Braaten, Misty	1.1.B
Brado, Jill	1.1.B
Brandenburg, Ann	1.1.A
Brashnyk, Paul	1.1.B
Bray, Martha	1.1.C
Bray, Sarah	1.1.A
Brewer, Matthew	1.1.B
Brichek, Gabe	1.1.B
Bridges, Miranda	1.1.B
Brizzi, Janet	1.1.B
Brooks, Angela	1.1.B
Browing, Joseph	1.1.B
Brown Lee, Kevin	1.1.B

Commenter	Comment Topic
Brown, Angela	2.1.D, 2.1.F, 2.1.J, 2.2.D
Brown, Christie	1.1.B
Brown, Christy	1.1.B
Brown, Dan	1.1.B
Brown, Denie	1.1.B
Brown, Derek	1.1.A
Brown, Ian	1.1.A
Brown, Robert	1.1.A
Brown, Susan	1.1.B
Brown, Tina	1.1.A
Bruce	1.1.A
Bruehl, Judith	1.1.B
Bryan	1.1.A
Bryant, Anita	1.1.A
Bryant, Laura	1.1.B
Bryskie, Adam	1.1.B
Bubak, John	1.1.B
Bubelis, Wally	2.2.D
Buchan, William	1.1.A
Buchanan, Emma	1.1.B
Buchanan, Katie	1.1.B
Buchanan, Katie Jo	1.1.B
Buchanan, Madalyn	1.1.B
Buckley, Linda	1.1.D
Budd, James	1.1.B
Budnik, Irina	1.1.B
Budnik, Jess	1.1.B
Budnik, Sam	1.1.B
Buer, Eric	1.1.A
Bugaychuk, Vadim	1.1.B
Bui, Casey	1.1.A
Buniatyan, David	1.1.B
Buniatyan, Eduard	1.1.B
Buniatyan, Naira	1.1.B
Burden-Brant Families	1.1.A
Burgess, Bill	2.1.J
Burgess, Sara	1.1.A
Burks, Laura	1.1.B
Burlak, Yelena	1.1.B
Burr, Eric	1.1.A

Commenter	Comment Topic
Burton, Billy	1.1.A
Burton, Gay	1.1.A
Bush, Terri	1.1.B
Butcher, Deanna	1.1.A
Butter, Dorothy	1.1.B
Button, Nancy	2.1.G, 2.1.J, 5.2.B
Byars, Patricia	2.1.J
Bynum, Ellen	2.1.G, 2.1.J, 2.2.A, 2.2.D, 3.3.B
Byrne, Jim	1.1.D
C	1.1.B
C, Dennis	1.1.B
C, H	1.1.B
C, Igor	1.1.B
C, Inna	1.1.B
C, Jerry	1.1.B
C, Lidiya	1.1.B
Camp, Deanna	1.1.B
Campos, Rulina	1.1.B
Cannon, Juli	2.2.D
Capan, Cigdem	1.1.A
Capps, Renee	1.1.B
Caputo, Dee	1.1.B
Carlsen, Steven	1.1.A
Carlson, Amy	1.1.A
Carlson, Cheri	1.1.A
Carole	1.1.A
Carolyn	1.1.A
Carpentier, Teri	1.1.B
Carpio, Juan	1.1.A
Carroll, Linda	1.1.A
Carrothers, David	1.1.A
Carruth, Erin	1.1.B
Carson, Susan	1.1.B
Cascade Forest Conservancy (Ashley Short)	1.1.D
Cascade River Local Stakeholder Support Letter (Submitted by Tom Uniak including support signature from multiple entities ¹¹)	1.1.C

¹¹ Entities include Dave M Paul (State Representative 10th Legislative District), Clyde Shavers (State Representative 10th Legislative District), Liz Lovelett (40th Legislative District), Alex Ramel (40th Legislative District), Debra Lekanoff (40th Legislative District), Satpal Singh Sidhu (Whatcom County), Kaylee Galloway (Whatcom County Council), Todd Donovan (Whatcom County Council), Ryan Walters (City of Anacortes), Christine Cleland-McGrath (City of Anacortes), Jeremy Carter (City of Anacortes), Amanda Hubik (City of Anacortes), Bruce McDougall (City of Anacortes), Carolyn Moulton (City of Anacortes), Anthony Young (City of Anacortes), Hannah E. Stone (City of Bellingham), Hollie Huthman (City of Bellingham), Daniel C. Hammil (City of Bellingham), Edwin H (Skip) Williams (City of Bellingham), Lisa A. Anderson (City of Bellingham), Michael Lilliquist (City of Bellingham), Kristina Michele Martens (City of Bellingham), Richard May (City of Blaine), Annie Taylor (Town of La Connor), MaryLee Chamberlain (Town of La Connor), Mary Wohleb (Town of La Connor), Juan Morales (Town of Mount Vernon), Richard Brocksmith (City of Mount Vernon), Chuck Owen (City of Sedro-Wooley), Timothy Manns (Skagit Audobon Society), Larry Lober (Greater Bellingham Running Club), Molly Doran (Skagit Land Trust), Eric Hayes (Superfeet Worldwide), Luke Baugh (Triad River Tours), Robert Kaye (North Cascades Audubon Society), Mary Kemper (Chuckanut Brewing), Peter Tyron (Nooksack Nordic Ski Club), Leo Bodensteiner (Skagit Environmental Endowment Commission), Gabe Epperson (Whatcom Land Trust), Tom Green (Evergreen Islands), Layne Carter (Aslan Brewing Company), Margaret Bushnell (Mount Baker Club), Frank W Koterba (Fourth Corner Fly Fishers), Jen Barker (Terramar Brewing and Distilling), Scott Willison (The Confluence Fly Shop), Monika Wieland Shields (Orca Behavior Institute), Marnie Jackson (Whidbey Environmental Action Network), Becca Gray and Nat Schons (Island Hoppin' Brewery), Becky Chaney (Skagit Indivisible), Colleen Chad Kuehl (Wander Brewing), Judith Atkins (Mount Baker Group – Washington State Sierra Club), Bridget Moran (North Sound Chapter of Trout Unlimited)

Commenter	Comment Topic
Cassato, Candice	1.1.A
Castillo, Olivia	1.1.A
Castro, Leo	1.1.B
Castro, Tinisha	1.1.B
Catlin, Sally	1.1.B
Caylor, Barbara	1.1.B
Cemvita (Kaci Baker)	1.1.B
Cemvita (Marcio Silva)	1.1.B
Cerrato, Deborah	1.1.B
Cestro, Cesar	1.1.B
Chadwick, John	1.1.A
Chamale, Jennifer	1.1.A
Chamberlain, Dave	2.1.E, 2.1.F, 2.1.J
Chambers, Dana	1.1.B
Chambers, Jane	1.1.B
Chambers, Joshua	1.1.B
Champeaux, Tina	2.1.D, 2.1.F, 2.2.D, 5.3.B
Chappell, Christopher	1.1.A
Chaprin, Olsa	1.1.B
Charles, David	1.1.A
Charles, Jason	1.1.A
Chase, Jacquelyn	1.1.B
Chavacko	1.1.B
Cheek, Sandy	1.1.B
Chelan County (Mike Kaputa)	2.1.H, 2.1.J, 2.1.K, 3.1.E, 4.2.B, 4.2.C, 5.3.A
Cherepiana, Kateryna	1.1.B
Cherneta, Ivan	1.1.B
Chernyavsigiy, Sergey	1.1.B
Chessin, M	1.1.A
Chew, Carl	1.1.A
Chirman, Darlene	1.1.D
Christie, Clayton	1.1.B
Chudott, Judith	1.1.B
Chuprin, Olga	1.1.B
Church, Lorraine	1.1.B
Citizen Action Defense Fund (Jackson Maynard)	2.1.D, 2.1.F, 2.2.D, 2.4.A, 2.4.C, 5.2.B, 5.3.B
City of Soap Lake (Michelle Agliano)	1.1.B

Commenter	Comment Topic
Clark, Donna	1.1.B
Clark, Jennifer	1.1.A
Clark, Kevin	1.1.A
Clark, Richard	1.1.B
Clayton	1.1.A
Clemmo, Sharon	1.1.B
Click, Pat	1.1.B
Clifford, Teri	1.1.B
Clingman, Harter	1.1.A
Close, Kathy	1.1.B
Cockfield, Patti	1.1.B
Coffin-Greenig, Cindy	1.1.A
Colby, Caitlyn	1.1.A
Cole, Tracy	1.1.B
Coleman	1.1.A
Coles, Margie	1.1.A
Collins, Tamela	1.1.A
Collins, Theresa	1.1.A
Colson, Lynn	1.1.A
Comanor, Kyle	1.1.A
Comin, Peggy	1.1.B
Compton, Marie	1.1.B
Conkle, Michael	1.1.B
Connell, Patricia	1.1.A
Conservation Northwest (Paula Sweeden)	1.1.A
Contreres, Samantha	1.1.B
Cooke, Deana	1.1.B
Cooke, Sandra	1.1.B
Corona, Heidi	1.1.B
Corrigan, Jennifer	1.1.A
Corso, John	1.1.A
Corso, Rose	1.1.B
Cortez, Elizabeth	1.1.B
Cortis, Mario	1.1.A
Cosmari, Zimoyis	1.1.B
Cosovan, Emme	1.1.B
Cosovan, Nicolai	1.1.B
Cotton, Tish	1.1.A
Coughtry, Chairein	1.1.B

Commenter	Comment Topic
Coulee Corridor Consortium (Mark Amara)	1.1.B
Cowan, Brian	1.1.A
Cowdrey, Lori	2.1.G, 2.1.J, 5.2.B
Cowlitz Indian Tribe (Christina Donehower)	1.1.D
Cox, David	1.1.A
Crandell, Michelle	1.1.B
Crary, John	1.1.B
Crawford, Sydney	1.1.A
Crawford, Wanda	1.1.A
Crivoi, R	1.1.B
Crocker, David	1.1.A
Cross, Kelsey	1.1.A
Crotsley, Tracy	1.1.B
Crouch, Lisa	1.1.B
Crowley, Marty	1.1.A
Crummett, Diane	1.1.B
Cummins, Robert	1.1.B
Cunningham, Brenda	1.1.C
Cunningham, Tessa	1.1.B
Curran, Ben	1.1.A
Curtis, Richard	1.1.A, 1.1.D
D, Kozliuk	1.1.B
D, N	1.1.B
D, Nicole	1.1.B
D, P	1.1.B
D, Paul	1.1.B
D, R	1.1.B
D, Sergey	1.1.B
D, T	1.1.B
D, Tara	1.1.B
D, Valentin	1.1.B
D, Y	1.1.B
D, Yekaterina	1.1.B
Dahnke, Ingrid	1.1.B
Daian, Anca	1.1.B
Dalluge, Elisia	1.1.A
Daniels, Melissa	1.1.B
Darst, Dolores	1.1.A

Commenter	Comment Topic
Dashkel, Alex	1.1.B
Dashkel, Raise	1.1.B
Davern, Brian	1.1.D
Davis, Brenda	1.1.B
Davis, Debbie	1.1.B
Davis, Loretta	1.1.B
Davis, Vickic	1.1.B
Davis, Virginia	1.1.A
Day, John	1.1.C
de Give, Anita	1.1.A
Deal, Brandie	1.1.A
Deaver, Joseph	1.1.A
Definitely Mabie Consulting (Penny Mabie)	1.1.D
DeGooyer, Brett	1.1.B
Dejar, Wendy	1.1.B
Denise, Yana	1.1.B
Dennis	1.1.B
Dennison, Matthew	1.1.D
Deobrah	1.1.A
DeSimone, Betsy	1.1.A
Desiree	1.1.A
Devnich, Jan	2.2.D
Dewey, Mary	1.1.B
DeWitte, Fran	1.1.B
Diakur, Lidiia	1.1.B
Diaz, Joel	1.1.B
Dick, Katarina	1.1.A
Dickinson, Amanda	1.1.A
Didur, Lidia	1.1.B
Didur, Roscaa	1.1.B
Didyk, Natalia	1.1.B
DiLabio, Gena	1.1.A
Dilbaryan, Gerorg	1.1.B
Dills, Quentin	2.3.A
DiStefano, Allison	1.1.B
Divelbiss, Jessica	1.1.B
Dix, Teresa	1.1.C
Dixon, Angie	1.1.A
Dlyayen, Anna	1.1.B

Commenter	Comment Topic
Don	1.1.A
Dondero Cohen, Taya	1.1.B
Dondero-Cohen, Julian	1.1.B
Dondero-Moss, Adriana	1.1.B
Donna	1.1.A
Donsmore, Justin	1.1.B
Doran-Turner, Tina	1.1.B
Doroshchuk, Anatoliy	1.1.B
Dorothy	1.1.A
Doss, Annie	1.1.A
Dotson, Curtis	1.1.B
Double O Ranch (Cindy Kleinhuizen)	2.1.J, 2.3.A, 2.3.F, 4.4.A
Douglass, Andronetta	1.1.A
Downey, Judith	1.1.A
Dowson, Eleanor	1.1.A
Doyel, Alice	1.1.A
Dragon, Water	1.1.A
Dronen, Amy	1.1.A
Dronen, Mark	1.1.A
Duane	1.1.A
Duck, Jennifer	1.1.B
Dudko, Alex	1.1.B
Dunham, Judith	2.1.G, 4.1.A, 4.1.F, 4.2.A
Dunn, Sharon	1.1.A
DuPoy, Allen	1.1.B
Dvornaya, Lynbore	1.1.B
E, Ghenadie	1.1.B
Easter, Tara	1.1.A
Eaton, Patrick	1.1.A
Ebaugh, Janet	1.1.B
Ebel, Bob	1.1.B
Echelbarger, Denise Marie	1.1.A
Ed	1.1.A
Edge, Debbie	1.1.D
Edwards, Robert	1.1.B
Efron, Deborah	1.1.A
Eidsness, Deborah KB	2.1.G, 2.1.J
Eir, Cheri	1.1.A
Eklund, Glenn	1.1.A

Commenter	Comment Topic
Eldridge, Sara	1.1.A
Elena	1.1.A
Eliuk, Jennifer	1.1.A
Elizabeth	1.1.A
Ellen	1.1.A
Ellingson, Karissa	1.1.A
Ellingson, Michael	1.1.B
Elmendorf, Phyllis	1.1.A
English, Connor	1.1.A
Ennis, Ron	1.1.A
Erbs, Lori	1.1.A
Erdmann, Felicity	1.1.B
Erfurth, Joyce	1.1.B
Erickson, Michael	1.1.B
Eskenazi, Penny	1.1.A
Espe, Greg	1.1.A
Esterer, Anna	1.1.B
Evans, Bee	1.1.A
Evans, Bronwen	1.1.A
Evans, Darryl	1.1.B
Evans, Joan	1.1.B
Evans, Sally	1.1.A
Evans, Susan	1.1.B
Eventyr, Kirstin	1.1.A
Evertsen, Ray	1.1.B
F, A	1.1.B
F, Nina	1.1.B
F, Noelle	1.1.B
F, S	1.1.B
F, Wanda	1.1.B
Faber, Rosemary	1.1.B
Fairchild, Jennifer	1.1.A
Fancher, Elizabeth	1.1.B
Farrar, Karen	1.1.B
Fatov, Lyudmile	1.1.B
Fatov, Vasily	1.1.B
Faubion, Andy	2.2.B, 4.6.A, 4.6.C, 5.2.B
Faulkner, Natalie	1.1.B
Faxon, Bee	1.1.C
Fedas, Olivia	1.1.B

Commenter	Comment Topic
Fedckyn, Fedir	1.1.B
Fedckyn, Vira	1.1.B
Fedus, Felix	1.1.B
Fedus, Juliette	1.1.B
Felicita, Angella	1.1.B
Felton, Denis	1.1.B
Felts, Terry	1.1.A
Feng, Ming	1.1.A
Fenner, Philip	1.1.A
Ferry, Jane	1.1.B
Fierro, Tallia	1.1.A
Finch, Indra	2.1.G, 2.1.J
Finnegan, Leo	2.2.A, 2.2.D, 2.4.A
Fiorani-Campbell, Frederique	1.1.A
Fischer, Sarah	1.1.A
Fisenko, Alexander	1.1.B
Fisenko, Lyvbov	1.1.B
Fisher, Charel	1.1.A
Fisher, Dennis	1.1.A
Fisher, Mary	1.1.B
Fitch, Athena	1.1.A
Fitzgerald, Jennifer	1.1.B
Fleener, Teresa	1.1.A
Fleming, Clare	1.1.B
Fletcher, Angel	1.1.B
Fletcher, Robert	1.1.B
Flower, Antonio	1.1.B
Folsom, Todd	1.1.A
Foote, Sheila	1.1.B
Forester, Kathryn	1.1.B
Forias, Elijah	1.1.B
Forman, Tyler	1.1.A
Forsman, David	1.1.B
Fort, Joetta	1.1.D
Foster, Brooks	1.1.A
Fountain, Mark	1.1.B
Fox, Kylie	1.1.B
Franett, Pete	2.1.J
Frankov, Ivan	1.1.B

Commenter	Comment Topic
Franks, Larry	1.1.A
Franz, Serenity	1.1.B
Fred	1.1.A
Freeman, Elena	1.1.B
Freeza, Roxie	1.1.D
French, Kerry	2.2.B, 4.6.A, 4.6.C, 5.2.B
Frey, Donald	2.1.G, 2.1.J
Friel, Richard	1.1.A
Frutiger, Christina	1.1.A
Fry, Blade	2.1.J, 5.3.B
Fulkerson, Melinda	1.1.B
Furey, Tom	1.1.A
G, Abraham	1.1.B
G, Deonna	1.1.B
G, Dmitriy	1.1.B
G, Evgenia	1.1.B
G, I	1.1.B
G, L	1.1.B
G, Leslie	1.1.B
G, N	1.1.B
G, Naomi	1.1.B
G, Natalia	1.1.B
G, Osor	1.1.B
G, P	1.1.B
G, S	1.1.B
G, Svetlana	1.1.B
Gagova, V	1.1.B
Gajewski, Dannah	1.1.B
Galbraith, Jessica	1.1.A
Galeena, Gumaro	1.1.A
Gallagher, Liam	1.1.A
Galloway, Angela	1.1.B
Gamsjager, Austin	1.1.A
Gaponeneo	1.1.B
Garand, Anthony	1.1.A
Garcia, Vanessa	1.1.B
Gardner, Jennifer	1.1.A
Garrett, Robert	1.1.B
Gastellum, Carolyn	1.1.C
Geer, Judy	1.1.B

Commenter	Comment Topic
Geesey, Nina	1.1.B
Gehling, William	1.1.B
Geiger, Craig	1.1.A
Geiss, Bailey	1.1.B
Geiss, Chris	1.1.B
Generoso, Erika	1.1.A
Gensitskey, Nickolay	1.1.B
Gerasimenko, Addie	1.1.B
Gerasimenko, Julie	1.1.B
Gerlach, Robin	1.1.B
Get, Evelyn	1.1.B
Getz, Jade	1.1.A
Gibson, Haylie	1.1.B
Gibson, Roberta	1.1.B
Gigliotti, Katrina	1.1.A
Gilbert de Vargas, Sally	1.1.B
Gilbert, J	1.1.B
Gisselberg, Susan	1.1.A
Glushchenko, Larissa	1.1.B
Glushchenko, V	1.1.B
Goedecke, Christine	1.1.A
Gogic, Laurie	1.1.A
Golovko, Ella	1.1.B
Gonzale, Frances	1.1.B
Gonzalez, A	1.1.B
Gonzalez, Eva	1.1.B
Gonzalez, M	1.1.B
Gonzalez, Martin	1.1.B
Gonzolas, Donna	1.1.B
Good, Randy and Aileen	2.1.J, 2.2.A, 3.3.B
Gooding, Alison	1.1.B
Gorbachova, L	1.1.B
Gorbunov, Vladimir	1.1.B
Gordiyenko, Leonid	1.1.B
Gordiyenko, Svetlana	1.1.B
Gordon, David	2.1.J
Gordon, Heather	1.1.C, 1.1.D, 1.1.E
Gordon, J W	1.1.A
Gordon, Marcy	1.1.A
Gorka, Nellie	1.1.B

Commenter	Comment Topic
Gorman, Judith	1.1.B
Gorman, Judith (Soap Lake Conservancy)	4.7.A, 4.7.B
Gould, Dan	1.1.B
Gould, Megan	1.1.B
Graham, Molly	1.1.A
Grajczyk, Joyce	1.1.A
Graleona, Daniel	1.1.A
Grant County Commissioner (Danny Stone)	2.1.J, 2.2.A
Gravelle, Raymond	1.1.B
Graves, John	1.1.B
Gray, Paula	1.1.B
Green, Allycia	1.1.B
Green, Isabella	1.1.B
Green, Olga	1.1.B
Green, Steve	1.1.A
Greg	1.1.A
Gregory, Bryon	1.1.B
Grelock-Yusem, David	1.1.A
Griashtat, Vitaly	1.1.B
Grigg, Scott	2.1.J, 3.1.A
Grigoryon, Greg	1.1.B
Grikay, Vladimir	1.1.B
Gromlich, Rebecca	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.3.A, 2.4.A, 2.4.C, 3.1.A
Gruber, James	1.1.B
Gruber, Ruth Ann	1.1.B
Grudowski, Ted	1.1.B
Gubarih, Nadezhda	1.1.B
Gubarih, Vasilig	1.1.B
Guerrero, Peter	1.1.A
Gugin, Patty	1.1.B
Guillory, Chris	1.1.A
Gulick, Amy	1.1.A
H, Carole	1.1.A
H, F	1.1.A
H, Kamee	1.1.B
H, L	1.1.A
H, Liudmyla	1.1.B

Commenter	Comment Topic
H, Martin	1.1.B
H, Nikolay	1.1.B
H, R	1.1.B
H, Tatiana	1.1.B
H, Vickie	1.1.B
Hafer, Sarah	1.1.A
Haight, Ryan	1.1.D
Hall, Shana	1.1.B
Halseth, Glenn	1.1.A
Hamid, Devin	1.1.A
Hamid, Zaki	1.1.A
Hammons, Dee	2.2.D
Hampt, Jalyn	1.1.B
Hampton Lumber (Anjolene Ngari)	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.4.A, 3.1.A, 5.3.B
Hampton Lumber (Douglas Cooper)	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.3.F, 2.4.A, 2.4.C, 3.1.A, 4.4.A, 5.2.B, 5.3.B
Hampton, Justin	1.1.B
Hancock, Matt	1.1.A
Haney, Dewey	1.1.B
Hannaford, Shelly	1.1.B
Hansen, Sherrie	1.1.B
Hanson, Pam	1.1.B
Hanson, Richard	2.1.G, 2.1.J
Hardwick, R Alan	1.1.A
Harmon, Susan	1.1.A
Harper, Gwendolyn	1.1.A
Harper, Robin	1.1.A
Harris, Carolyn	1.1.B
Harry	1.1.A
Harryton, Andrew	1.1.A
Hartley, Michael	1.1.A
Harty, Florence	1.1.A
Harvey, Jo	1.1.A
Harvey, Rhea	1.1.A
Hasper, Beverly	1.1.B
Hassenzasen, Parier	1.1.B
Hasten, Connie	1.1.B
Hatton, Mike	1.1.B
Hausman, Todd	1.1.B

Commenter	Comment Topic
Hawes, Eileen	1.1.D
Haworth, Casey	1.1.B
Hayden, Larry	2.1.G, 2.2.A, 2.2.B, 2.2.D, 2.3.B, 2.3.D, 3.1.A, 3.3.A, 4.1.A, 4.1.D, 4.1.F, 4.2.A, 4.3.G, 4.4.A, 4.6.A, 4.6.C, 5.1.A, 5.1.B, 5.2.B
Hayden, Nadya	1.1.B
Hayden, Nathaniel	2.1.J, 2.3.A, 2.3.F, 4.4.A
Hayes, Leanna	1.1.B
Heavyrunner, Mia	1.1.A
Heidel, Ed	1.1.A
Heinrich, John	1.1.B
Helm, Carla	1.1.C
Hemphill, Patricia Joan	1.1.A
Henderson, Colin	1.1.B
Henling, Daniel	1.1.A
Henneghan, Patrick	1.1.A
Hennig, Jason	2.1.G, 2.1.J
Herke-Canterbury, Marilyn	2.1.J
Hernandez, Mer	1.1.B
Hernandez, Romen	1.1.B
Hernandez, Rowen	1.1.B
Herron, Lorena	1.1.D
Heywood, Susan	1.1.A
Highberg, Laura	1.1.A
Hildebrandt, Marysue	1.1.A
Hill, Jim	1.1.B
Hill, Michael and Barbara	1.1.A
Hill, Shannon	1.1.B
Hill, Tim	1.1.B
Hillery, Jamie	2.1.G, 3.1.A, 3.2.A, 3.2.B, 3.2.D, 3.2.E, 3.3.B
Hirsely, Dustin	1.1.A
Hirst, Ruby	1.1.B
Hisham	1.1.A
Hishchenko, Yev	1.1.B
Hodge, M	1.1.B
Hoex, Chris	1.1.A
Hoff, Marilyn	1.1.A
Hoffman, Marie	1.1.A
Hogan, Judi	1.1.B
Hogan, Robert	1.1.B

Commenter	Comment Topic
Hogeweide, Ted	2.1.G, 5.2.B
Holcomb, Hayley	1.1.A
Holden	1.1.B
Holder Jr., H. Lehman	1.1.D
Holder, Mary Ruth and Phillip	1.1.C
Hollenbeck, Denise	1.1.A
Holm, Buzzy	1.1.B
Holmquist, Stephanie	1.1.A
Holt, Alexander	1.1.C
Holt-Morehouse, Bonnie	1.1.B
Holtzman, Julie	1.1.A
Hong, Kay	1.1.A
Hong, Kha	1.1.A
Hong, Lynn	1.1.A
Hooper, Kristin	1.1.B
Hovenkotter, Kirk	1.1.A
Howard, John	1.1.B
Howlett, Cassandra	1.1.B
Hoyt, Spencer	1.1.D
Hubbard, Valerie	1.1.A
Huber, Linda	1.1.B
Hudson, Dorothy	1.1.A
Hudson, Rosanne	1.1.D
Huertes, Ryan	1.1.B
Huff, Jamie	1.1.B
Huie, Marcia	1.1.A
Humann, Chris	2.2.A, 2.2.D
Hummel, Kyoko	1.1.B
Humphrey, Melody	1.1.B
Hunter/Angler ORW Support Letter (Tom Uniack)	1.1.A
Hutsell, Rebecca	1.1.B
Hutsell, Wayne	1.1.B
Huxtable, Patricia	1.1.B
I	1.1.B
I, Valentina	1.1.B
Iakevenko, Slitlana	1.1.B

Commenter	Comment Topic
Ice Age Floods Institute/ Lower Grand Coulee Chapter (Denis Felton and Gene Wing)	1.1.B
Ignatenko, Alex	1.1.B
Ignatenko, Sarah	1.1.B
Inna, Shvager	1.1.B
Isakson, Jenna	1.1.A
Ison, Oksana	1.1.B
Israel, Luke	1.1.B
Itel, Don	1.1.A
Ivanov, Peter	1.1.B
Iverson, Gordon	2.1.G, 2.1.J, 3.1.A
Iyeruserlimets, Alex	1.1.B
Izotova, Maria	1.1.B
J, Martha	1.1.B
Jackson, Cheryl	1.1.B
Jackson, Delvina	2.1.J
Jackson, Michael	2.2.D
Jacobs, Nancy	1.1.A
Jacobson, Robin	1.1.A
Jahn, Nick	1.1.B
James	1.1.A
James, Hansen	1.1.A
James, Karen	1.1.A
James, Linda	1.1.B
Janelle	1.1.A
Janicki, Peter	2.3.A
Janicki, Robert	2.3.A
Janien, Angelina	1.1.B
Janzen, Dimitri	1.1.B
Jaspers, Jade	1.1.A
Jaspers, Janet	1.1.A
Jasperson, Apryl	1.1.B
Jeannie	1.1.A
Jennings, Tasceaie	1.1.A
Jensen, Antoinette	1.1.A
Jensen, Jean	1.1.A
Jerry	1.1.A
Jerskey, Paul	1.1.A

Commenter	Comment Topic
Jessica	1.1.A
Jladimir	1.1.B
Joanne	1.1.A
Joe	1.1.A
John	1.1.A
Johnson, Hayleigh	1.1.B
Johnson, Jeff	1.1.A
Johnson, Lorraine	5.1.D
Johnson, Terra	1.1.B
Johnston, Julie	1.1.B
Jokela, Mary	1.1.A
Jonas, Jayme	1.1.A
Jonathan	1.1.B
Jones, Clayton	1.1.B
Jones, Deb	2.2.D
Jordan, Dorothy	1.1.A
Josephson, Deanna	1.1.B
Journey, Cyndy	1.1.A
Judd, Annette	1.1.B
Juhre, Sue	1.1.A
Julia	1.1.A
Juliette	1.1.A
June	1.1.A
K, A	1.1.B
K, Edward	1.1.B
K, Elizaveta	1.1.B
K, Eugene	1.1.B
K, Lyubov	1.1.B
K, Maria	1.1.B
K, Mavicja	1.1.B
K, N	1.1.B
K, Olena	1.1.B
K, Olga	1.1.B
K, Olpa	1.1.B
K, Pepper	1.1.B
K, Tetyana	1.1.B
K, Tony	1.1.B
K, V	1.1.B
Kadoun, Debra	1.1.B
Kaija	1.1.A

Commenter	Comment Topic
Kaiser, Ramona	1.1.B
Kane, Edward	1.1.A
Kangas, Roxanne	1.1.B
Kasanov, Olga	1.1.B
Kast, Jonathan	1.1.B
Kastnee, Tammy	1.1.B
Kastner, Karli	1.1.B
Kataiina	1.1.B
Kathy	1.1.A
Katyukha, V	1.1.B
Katz, Josh	1.1.B
Katz, Naomi	1.1.A
Kaye, Deborah	1.1.A
Kazak, G	1.1.B
Keadle, Beth	1.1.B
Keeler, Timothy	1.1.A
Kel	1.1.B
Keller, Donna	1.1.C
Keller, Gerald	1.1.A
Keller, Robert	2.2.D
Kelley, Chelsea	1.1.B
Kelley, Kyree	1.1.B
Kelley, Lydia	1.1.B
Kelley, Michael	1.1.B
Kelley, Zach	1.1.B
Kelly, Patrick	1.1.A
Kemper, Mari	1.1.A
Kemper, Will	1.1.A
Kendall, Lydia	1.1.A
Kenny, Daniel	1.1.A
Keptya, Sergey	1.1.B
Kerr, Laurie	1.1.D
Ketcham, Terry W	2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.4.A, 5.3.B
Key, Margaret	1.1.B
Key, Patrick	1.1.B
Key, Shelly	1.1.B
Keyes, Jeannie	1.1.A
Khalil, Ra'id	1.1.A
Kiforishin, Yelena	1.1.B
Kihlstrom, Liz	1.1.A

Commenter	Comment Topic
Kile, Mary	1.1.B
King, Stacy Lee	1.1.B
Kirshenbaum, Michael (Skagit Land Trust)	1.1.C
Kisel, Lyudmila	1.1.B
Kisel, P	1.1.B
Kitoyan, Aida	1.1.B
Kitsen, Emma	1.1.B
Kittitas County (Cory Wright)	2.1.G, 2.1.J, 2.1.K, 2.2.A, 2.2.D, 5.3.B
Klein, Leila	1.1.A
Klenke, Phillip	1.1.A
Knickmeyer, Jared	1.1.A
Knight, Lisa	1.1.B
Knight, Mary	5.2.B
Knowles, Lorelette	1.1.A
Knowles, Mary	1.1.B
Knudsen, Elizabeth	2.1.G, 2.1.J
Knudsen, KS	1.1.B
Koehn, Yulia	1.1.B
Koliksh, Bogdan	1.1.B
Koliksh, Mikhailik	1.1.B
Kollasch, Mark	2.2.D
Koltunov, Simeon	1.1.B
Kopochkin, Y	1.1.B
Korbulic, Chris	1.1.E
Korn, Meryle A	1.1.A
Korotkova, Evgeniya	1.1.B
Korson, Nadya	1.1.B
Kosa, Kim	1.1.C
Koss, Kathy	1.1.B
Kostanich, Trevor	1.1.A
Kostenko, Anatoly	1.1.B
Kostenko, Nina	1.1.B
Kosterva, Marina	1.1.B
Kot, V	1.1.B
Kotelneilrov, Zinaids	1.1.B
Kouko, Didia	1.1.B
Kovach, Alex	4.1.E, 4.7.A, 4.7.C
Kovach, Mary	1.1.B

Commenter	Comment Topic
Koval, Rurim	1.1.B
Kovalenko, Yuriy	1.1.B
Kovalyzer, Gelina	1.1.B
Kovalyzer, Viktro	1.1.B
Kovelova, Y	1.1.B
Kozlov, Absalom	1.1.B
Kozlov, Alexander	1.1.B
Kozlov, Anna	1.1.B
Kozlov, Jasime	1.1.B
Kozlov, Nadezhda	1.1.B
Kozlov, Nicolas	1.1.B
Kozlov, Valentina	1.1.B
Kramer, Kathleen	1.1.B
Kraus, Kelly	1.1.A
Kraushaar, Sunday	1.1.A
Kravchuro, Sergey	1.1.B
Kremer, Ann	1.1.D
Krieger, Kim	1.1.A
Kriete, Kenneth	1.1.B
Krista	1.1.A
Kronenberger, Eliza	1.1.A
Krushelnytsba, Nataliya	1.1.B
Kucherenko, Liedmyla	1.1.B
Kuhn, Susan	1.1.A
Kumas, Nikhil	1.1.A
Kumma, Beth	1.1.A
Kumma, Maddie	1.1.A
Kumma, Norm	1.1.A
Kurishko, Oleg	1.1.B
Kurkov, Natasha	1.1.B
Kurkov, Timofey	1.1.B
Kuzmenko, Denis	1.1.B
L	1.1.B
L, Alex	1.1.B
L, I	1.1.B
L, Ivan	1.1.B
L, M	1.1.B
L, N	1.1.B
L, P	1.1.B
L, Pavel	1.1.B

Commenter	Comment Topic
L, Tatiana	1.1.B
L, U	1.1.B
L.I.G.H.T. Foundation (Joaquin Marchand)	1.1.B
Laban, Lovely	1.1.B
Lagies, Melissa	1.1.B
Lague, Rich	1.1.C
Laing, Steve	1.1.A
Lajtos, Kristina	1.1.B
Lamb, Barbara	1.1.A
LaMorticella, Tony	1.1.A
Lampard, Keith	1.1.A
Lang, Shirley	1.1.B
Langevin, Dori	1.1.B
Lanyon, Ashley	1.1.A
Lapiuk, Andrii	1.1.B
Larsen, Andrew	1.1.A
Larsen, Kim	1.1.A
Larson, Elizabeth	1.1.A
LaRue, Erik	1.1.A
Lattimore, Kristina	1.1.A
Laura	1.1.A
Laurel, Jesus	1.1.A
Lawnicki, Gail	1.1.B
Leatham, Ellen	1.1.D
Leavitt, Mike	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 3.1.A
Ledden, Dennis	1.1.A
LeDuc Montgomery, Alicia	1.1.D
Lee, Alice	1.1.B
Lee, Vanessa	1.1.A
LeGault, Rachel	1.1.A
Leggett, BJ	2.1.G, 2.1.,
Lehman Miller, Beth	1.1.B
Leibrand, Stella	1.1.B
Leifker, Karen	1.1.A
Leo	1.1.A
Leonard, Janet	1.1.B
Leonov, George	1.1.B
Letienmayer, Alison	1.1.A
Lewis, Daniel	1.1.B

Commenter	Comment Topic
Lewis, Jason	1.1.B
Lewis, Sandra	1.1.B
Liliya	1.1.B
LilyAnn	1.1.B
Lin	1.1.A
Linda	1.1.A
Lindenmeyer, Karen	1.1.B
Lindsay, Ron	1.1.C
Link-New, Virgene	1.1.A
Lipsky, Nick	1.1.A
Little, Mildred	1.1.B
Littleton, Cody	1.1.A
Littleton, Marilyn	1.1.B
Livbov, Scherbakova	1.1.B
Lloyd, Ralph	1.1.C
Lobb, Lois Diane	2.2.D
Lodianoy, Alexandr	1.1.B
Lodianoy, Olga	1.1.B
Loeffler, Jonathan	1.1.A
Lofton, Saab	1.1.A
Loncarovich, Anna	1.1.B
Long, Colleen	1.1.B
Long, Don	1.1.B
Loomis, Gregory	1.1.A
Lord, Marisa	1.1.A
Love, Bob	1.1.A
Love, Kerri	1.1.A
Love, Ranessa	1.1.B
Lovejoy, Valerie	1.1.A
Lower Columbia Fish Enhancement Group	1.1.D
Lower Grand Coulee Chapter of the Ice Age Floods Institute (Denis Felton)	1.1.B
Lozko, Maryna	1.1.B
Lukashova, Natalia	1.1.B
Lund, Traci	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.3A, 2.3.C, 3.1.A, 5.2.B, 5.3.B
Lupanov, Anna	1.1.B
Lutsenko, Liudmyla	1.1.B
Lutsenko, Yuliana	1.1.B

Commenter	Comment Topic
Lynne	1.1.A
Lyons, Alana Louise	1.1.A
Lysaya, Anita	1.1.B
Lysyy, Vasiliy	1.1.B
M Long, Teresa	2.1.G, 2.1.J
M, Anna	1.1.B
M, Joe	1.1.B
M, Lidia	1.1.B
M, M	1.1.B
M, Madeline	1.1.B
M, Maxim	1.1.B
M, Olha	1.1.B
M, Philip	1.1.B
M, Sergey	1.1.B
M, Valentyna	1.1.B
M, Vasyl	1.1.B
M, Yuriy	1.1.B
Maahs, Kathy	2.2.B, 5.2.B
Mabbott, MaryAnn	1.1.A
Machuk, Anatolii	1.1.B
Mackay, Carolyn	1.1.B
MacPherson, Darcy	2.1.G, 2.1.J
Madden, Kari	1.1.B
Madden, Rachel	1.1.A
Madrigal, David	1.1.B
Magana, Maria	1.1.A
Magner, Millie	1.1.A
Mahannah, Christopher	1.1.A
Mahder, Debbie	1.1.A
Maher, James	1.1.B
Maher, Tracy	1.1.B
Mahnke, Denise	1.1.A
Mai	1.1.A
Mastruk, Olga	1.1.B
Mastruk, Serbii	1.1.B
Maksimekno, Anna	1.1.B
Maksymyak, Oresta	1.1.B
Mallon, Christine	2.1.J
Malone, Lindsay	1.1.E
Mamko, Elena	1.1.B

Commenter	Comment Topic
Mamko, Pavel	1.1.B
Mancill, Tony	1.1.D
Manita, Olga	1.1.B
Manning, Carter	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 3.1.A
Manning, Joyce	1.1.B
Manns, Timothy (Skagit Audubon Society)	1.1.A, 1.1.C
Manship, Joyce	1.1.B
Mantsevich, Mikhail	1.1.B
Marchuk, Anatolii	1.1.B
Margo	1.1.A
Margulies, Mimi	1.1.C
Marian	1.1.A
Marianne	1.1.A
Marina	1.1.B
Marino, Robert	1.1.B
Mark	1.1.A
Markley, Sammy	1.1.B
Marti, John	1.1.A
Martin, Grey	1.1.A
Martin, Shawlene	1.1.B
Martinez, Priscilla	1.1.A
Mary	1.1.A
Masterson, Ryan	5.1.C
Mastin, Carolyn	1.1.D
Mataya, Karen	1.1.B
Mateyvskaia, Vera	1.1.B
Mathews, Holger	1.1.A
Matzke, Tina	1.1.A
Mayn, Alex	1.1.B
McAfee, Dennis	1.1.A
McAlister, Diana	1.1.B
McCall, Kris	2.4.A, 2.4.C
Mccall, Vikki	1.1.A
McCavern, Patrick	1.1.A
Mcclellan, Perry	1.1.B
McClintock, Gloria	1.1.A
McConnor, AnnaMarie	1.1.A
McCowen, Adam	1.1.B
McCowen, Shannon	1.1.B

Commenter	Comment Topic
McDonald, Margaret	1.1.B
McDougall, Cassandra	1.1.A
McGill, Jen	1.1.A
McGivern, Mike	1.1.A
Mcgrath, Jeff	1.1.B
McGrath, Ryan	1.1.A
McGregor, Alex	1.1.B
McGregor, Linda	1.1.B
McKay Healthcare and Rehab	1.1.B
McKee, David	1.1.B
McKee, Janet	1.1.B
McKenna, Theresa	1.1.B
McLagan, Carol	1.1.B
McManamen, John	1.1.A
McMasters, Andrew	1.1.A
McMillan, Riley	1.1.B
McWalter, David	1.1.B
McWilliams, Susan	1.1.B
Meek, Josh	2.1.J, 3.1.A
Meek, Patricia	1.1.B
Meek-Shively, Stephen	1.1.A
Meier, Robert	5.2.B
Mel	1.1.A
Melchor, Maribel	1.1.B
Melendez, Hernandez	1.1.B
Melovatska, Luomvla	1.1.B
Melovatska, Vlodimir	1.1.B
Mendoza, G	1.1.B
Merkle, Volus	1.1.B
Meronte, Anthony	1.1.B
Merrell, Mary	1.1.A
Meus, Mason	1.1.B
Michael and Barbara	1.1.A
Mikhaylov, Igor	1.1.B
Mikhaylov, Svetlana	1.1.B
Milano, Sheila	1.1.B
Milichur, Dina	1.1.B
Miller Skinner, Beverly	1.1.B
Miller, Barbara	4.1.A, 4.6.A, 5.1.A

Commenter	Comment Topic
Miller, Dving	1.1.B
Miller, James	2.1.G, 2.1.J
Miller, John	1.1.A
Miller, Ken and Bonnie	2.2.A, 2.2.D, 5.3.A
Miller, Marcus	1.1.A
Miller, Norman	1.1.B
Miller, Rosalyn	1.1.B
Miller, Russ	1.1.B
Mills, Tracy	1.1.B
Milton, Erik	1.1.B
Minier, David	1.1.B
Minier, Hayley	1.1.B
Mir, Vladi	1.1.B
Mirzaa, Ghayda	1.1.A
Mitchell, Cindy (Washington Forest Protection Association)	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.3.A, 2.4.A, 3.1.A, 5.2.B, 5.3.B
Mitchell, Jessica	2.1.G, 2.2.A, 2.2.D, 3.1.A
Mitchem, Darcy	2.2.A, 2.2.D, 4.3.A, 4.4.A, 4.3.B, 4.4.D
Mitin, Aleksy	1.1.B
Mitin, Peter	1.1.B
Mitina, Lada	1.1.B
Mnushko, Oleksandr	1.1.B
Mnushko, Sergiy	1.1.B
Mo, Kristin	1.1.A
Modrell, Denise	1.1.B
Moire, Shelley	1.1.B
Mokhnach, Mark	1.1.B
Mokhnach, Nina	1.1.B
Molchanets, Roman	1.1.B
Molchanets, Sergiy	1.1.B
Molitor, Emily	1.1.B
Monasmith, Candace	1.1.B
Montenguisse, Lisa	1.1.B
Montgomery, Andrea	1.1.A
Montgomery, Teresa	1.1.B
Moody, John Robert	1.1.B
Moore, Amanada	1.1.B
Moore, Jesse	1.1.B
Moore, Kurt	1.1.B

Commenter	Comment Topic
Moore, Lynn	1.1.B
Moore, Melissa	1.1.A
Moore, Rosemary	1.1.A
Moore, Tonya	1.1.B
Morales, Reina	1.1.B
Mordavets, Andrii	1.1.B
Mordavets, Angeline	1.1.B
Moreno, Erick	1.1.B
Morgan, Dan	1.1.A
Mori, Lidia	1.1.A
Moriyasu, Saya	1.1.B
Morkhun, Luda	1.1.B
Morrill, Sean	1.1.A
Morris, Jonathan	1.1.A
Morrisey, Shae	1.1.B
Morrison, Shelley	1.1.D
Morton, Sara Ray	1.1.B
Morton, Sarah	1.1.B
Moshniakov, Ganna	1.1.B
Moshniakova, Yulia	1.1.B
Moskalets, Alex	1.1.B
Moskalets, Raisa	1.1.B
Moss, Michael	1.1.B
Mower, Amy	1.1.A
Moynhan, Samantha	1.1.A
Muegge, Brian	1.1.A
Mueller, Mark	1.1.C
Mulcare, James	1.1.A
Mulik, Aleksandr	1.1.B
Mulik, Diana	1.1.B
Mulik, Inna	1.1.B
Mulik, Max	1.1.B
Mulik, Victor	1.1.B
Mulik, Vladimir	1.1.B
Multiple Organizations ¹²	1.1.A, 3.1.F

¹² Cascade Forest Conservancy (Molly Whitney), Washington Wild (Tom Uniak), Jess Helsley (Wild Salmon Center), Trout Unlimited (Dean Finnerty), American Whitewater (Thomas O'Keefe), American Rivers (Sarah Drydahl)

Commenter	Comment Topic
Multiple Outdoor Recreation Organizations and Businesses <i>(Submitted by Thomas O'Keefe with support signatures by multiple entities¹³)</i>	1.1.A
Murgo, Linda	1.1.A
Murphy, Peter	1.1.A
Murphy, Taylor	1.1.B
Murphy, Tiffany	1.1.A
Murray, Joseph	2.1.J, 2.3.A, 2.3.F, 4.4.A
Murray, Susanne	1.1.A
Murziuk, Irene	1.1.B
Musnitskiy, Petr	1.1.B
Musnitsraya, Klavidiya	1.1.B
Mussalman, Karen	1.1.B
Myers Jr, Olin	1.1.A
Myette, Emily	1.1.A
N	1.1.B
N, Anna	1.1.B
N, N	1.1.B
N, Timothy	1.1.B
Nagyfy, Desiree	1.1.A
Nakonechna, Tetiana	1.1.B
Nakonechny, Jenni	1.1.B
Nakonechnyy, A	1.1.B
Nakonechnyy, Maria	1.1.B
Nakoredmy, Viktoriya	1.1.B
Nancy	1.1.A
Napeequa River Joint Local Stakeholder Support Letter <i>(Submitted by Tom Uniak with support signatures by multiple entities¹⁴)</i>	1.1.E
Napp, Jeffrey	1.1.A
Nastyuk, Valeriy	1.1.B
Nastyuk, Yelena	1.1.B
Nataliya, Y	1.1.B
Natural Medicine	1.1.B
Naum, Serg	1.1.B

¹³ American Whitewater (Thomas O’Keefe), Astral (Cooper Lambla), Evergreen Mountain Bike Alliance (Yvonne Kraus), Hard Core Paddles (Mike Nash), Immersion Research (Kara Weld), League of Northwest Whitewater Racers (Jennie Goldberg), Lower Columbia Canoe Club (William Gehr), MiiR (Devon Richardson), Mountain Gea Inc. (Paul Fish), Paddle Trails Canoe Club (Jesse Swedlund), Patagonia (Meghan Wolf), Spokane Canoe and Kayak Club (Brian Durham), Spokane Mountaineers (Brannen Morris), The Mountaineers (Betsy Robblee), Washington Climbers Coalition (Matt Perkins), Washington Recreational River Runners (Rebecca Post), Washington Trails Association (Michael DeCramer), Winter Wildlands Alliance (Hilary Eisen)

¹⁴ North Central Washington Audubon Society (Arthur Campbell), Wildwater River Guides (Lance Reif), Yakima Chief Hops (Levi Wyatt), Icicle Brewing Company (Pamela Brulotte), Northwest Mountain School (John and Olivia Race), Kittitas Audubon Society (Steve Loitz), El Sendero Backcountry Ski and Snowshoe Club (Gus Bekker), Yakima River Runners (Michael Aquilino), Sierra Club Washington Chapter (Margie Van Cleve), Bale Breaker Brewing Company (Kevin and Meghann Quinn)

Commenter	Comment Topic
Nauyani, Rahul	1.1.A
Nava, Jorge	1.1.A
Navarro, Nabor	1.1.A
Neal, William	1.1.A
Neese, Harvey	1.1.A
Negrov, Sergey	1.1.B
Negrov, Vera	1.1.B
Nelson, Katherine	1.1.A
Nesse, Kristine	1.1.B
Newman, Josee	1.1.B
Newman, Monty	1.1.A
Newton, Emily	1.1.B
Nick	1.1.B
Nicolai, Jane	1.1.A
Nielsen, David	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 3.1.A
Nielsen, Jennifer	1.1.B
Nielsen, Marget	1.1.B
Niholin, Ed	1.1.B
Nikiforets, Mariya	1.1.B
Nikiforets, Vasiliy	1.1.B
Nikitina, Olga	1.1.B
Nikolaychuk, Andtol	1.1.B
Nikolayer, Andrey	1.1.B
Nilson, Claudia	1.1.B
Noah, Debra	1.1.B
Nobley, Craig	1.1.A
Nolasco, Chris	1.1.A
Nordlund, Shelley	1.1.A
North Cascades Audubon Society (Robert Kaye)	1.1.C
Novak, Josh	1.1.B
Novikov, Paulo	1.1.B
Nunez, Jose	1.1.A
Nunez, Veronica	1.1.A
Nutt, Don	1.1.B
Nyary, Bondi	1.1.D
Nyborg, Julie	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.4.C, 3.1.A, 5.2.B, 5.3.B
Nyez, Duane	1.1.B
O, A	1.1.B

Commenter	Comment Topic
O, Mary	1.1.B
Oakes, Angeles	2.2.B, 2.2.D, 3.1.A, 3.3.A
Obispo, Liza	1.1.A
O'Brien, Paula	1.1.A
O'Brien, William	1.1.A
O'Dell, Carol	1.1.B
O'Donald, Julie	1.1.A
O'Haegher, Kyra	2.1.G, 2.1.J
O'Leary, Anna	1.1.B
O'Leary, Bobbie	1.1.B
Olex	1.1.B
Olidinchuk, Elena	1.1.B
Olidinchuk, Emiry	1.1.B
Oliinyk, L	1.1.B
Oliinyk, Natalia	1.1.B
Oliver, Norman	2.2.A, 2.2.D
Olson, Brooky	1.1.B
Olson, Caley	1.1.B
Olson, Janis	1.1.A
O'Neill Pine Company (Richard Pine)	2.2.D
O'Neill, Devon	1.1.A
Oneill, Paula	1.1.B
Onyshchuk, Iryna	1.1.B
Onyshchuk, Roman	1.1.B
Orr, M Lou	1.1.A
Oryshchenko, Nataliya	1.1.B
Osborne, Mark	1.1.A
O'Shea, Mike	1.1.A
Osor, Erkhem	1.1.B
Ostrer, Allison	1.1.A
Ostrom, Anika	1.1.A
Ostrovskaya, Yulia	1.1.B
Ostrovskyi, S	1.1.B
O'Sullivan, Margaret	1.1.A
Ouellette, Tracy	1.1.A
Owen, Susan	1.1.A
Owens, Michael	1.1.B
Owens, Timothy	1.1.B
P, Galina	1.1.B

Commenter	Comment Topic
P, Inh	1.1.B
P, Maria	1.1.B
P, S	1.1.B
P, Sergiv	1.1.B
P, T	1.1.B
P, V	1.1.B
P, Victor	1.1.B
Padelford, Grace	1.1.A
Page, Karen	1.1.B
Palmer, Elizabeth	1.1.B
Palmer, Judy	1.1.A
Palmer, Nancy	1.1.B
Palumbo, Julieann	1.1.A
Panlasigui, Maricar	1.1.A
Park, Byong	1.1.B
Park, Jenny	1.1.B
Parker, Greg	1.1.B
Parker, Jill	1.1.B
Parker, Lance	1.1.A
Parker, Natalia	1.1.B
Parker, Nellie	1.1.B
Parsley, Adina	1.1.A
Parsons, Lisa	1.1.D
Pashkovsty, Julia	1.1.B
Pashnovsky, Yelena	1.1.B
Pate, Mary	1.1.B
Pattison, Candice	1.1.B
Paul, Judith	1.1.B
Paulson, Patrick	1.1.B
Paulus, Marilyn	1.1.B
Pavel, Daniel	1.1.B
Pavel, Jessica	1.1.B
Pavlenko, Andrey	1.1.B
Pavlovich, Anna	1.1.B
Pavlukov, Deanna	1.1.B
Paxlyshyn, V	1.1.B
Payton, Fay	1.1.A
Peba, Marjorie	1.1.B
Pedersen, Celia	1.1.A
Pennell, Dennis	1.1.D

Commenter	Comment Topic
Perales, Carole	1.1.A
Perdykh, Olene	1.1.B
Peregrino, Karla	1.1.B
Perekopsky, Pavel	1.1.B
Perkins, Lela	1.1.A
Perkins, Rebecca	1.1.B
Perron, Patricia	1.1.A
Perry, Theresa	1.1.B
Peters, Jeanne	1.1.B
Peters, Jeanne S	1.1.B
Peters, Tara	1.1.A
Peters, Thom	1.1.A
Peterson, Barbara	1.1.A
Peterson, Brock	1.1.A
Petro, Didur	1.1.B
Petrus, Adrian	1.1.B
Phan, Ut	1.1.A
Philip	1.1.A
Piatnitsky, Esther	1.1.B
Picken, Gayle	1.1.B
Pierce County Council (Amy Cruver)	2.1.G, 2.1.J, 2.1.K, 2.2.A, 2.2.D, 2.3.A
Pierens, Galina	1.1.B
Pik, Gennadur	1.1.B
Pik, Lidiya	1.1.B
Pikhulya, Sergiy	1.1.B
Pilat, Anatoly	1.1.B
Pilat, Oksana	1.1.B
Pinon, Maria	1.1.A
Piontkevich, Vitaliy	1.1.B
Piontkeviech, Liliya	1.1.B
Piontkeviech, Vithliy	1.1.B
Piven, Tatyana	1.1.B
Plironov, Nataliya	1.1.B
Plukchi, Andre	1.1.B
Poe, Sheila	1.1.B
Poff, Dixon	1.1.B
Poggi, Kim	1.1.B
Pogosova, Era	1.1.B
Poksam, Natalya	1.1.B

Commenter	Comment Topic
Polupan, Larisa	1.1.B
Polyan, Nataliya	1.1.B
Polyansky, Elija	1.1.B
Polyansky, Mila	1.1.B
Ponkratov, Liliya	1.1.B
Poole, Leslie	1.1.B
Popkov, Sergey	1.1.B
Popkova, Larisa	1.1.B
Poposyan, Tigran	1.1.B
Popravko, Iiyana	1.1.B
Poprova, Dine	1.1.B
Post, Rebecca	1.1.A
Potts, Paul	1.1.A
Powers, Tom	1.1.C, 1.1.D
Pratt, Debbi	1.1.A
Prescott, Susan	1.1.B
Price, Terry	1.1.A
Pride, Sherri	1.1.B
Prisakar, Nina	1.1.B
Proctor, Gary	1.1.A
Prokhor, Lyerdmila	1.1.B
Prokhor, Viktor	1.1.B
Proudfoot, Pat	1.1.B
Provost, Lin	1.1.A
Puglisi, Philip	1.1.B
Pulliam, Chelsea	1.1.A
Pyzhivskyx, Lyudmila	1.1.B
Qi, Yukuan	1.1.B
Quigley, Chaundra	1.1.B
Quincy-Columbia Basin Irrigation District (Roger Sonnichsen)	4.1.H, 4.2.D
Quinn, Ann	1.1.B
Quinn-Shea, Daniel	1.1.A
Quintero, Ismael	1.1.B
Quintero, Shauna	1.1.B
R	1.1.A
R, Anna	1.1.B
R, Josh	1.1.B
R, Olena	1.1.B

Commenter	Comment Topic
R, P	1.1.A
R, Renea	1.1.B
R, S	1.1.B
Radchuk, Serbii	1.1.B
Radelet-Stein, Persephine	1.1.A
Rader, Patti	1.1.A
Rainey, Laura	1.1.A
Rains, Karl	1.1.B
Ralph	1.1.A
Ramsell, Donna	1.1.B
Rang, Cynthia	1.1.B
Raskin, Vldimir	1.1.B
Rasyaney, Fedir	1.1.B
Ratcliff, Philip	1.1.A
Raugust, Cathie	1.1.B
Ray, Cindy	1.1.B
Raydalov, Andriy	1.1.B
Rayonier (Holli Johnson)	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.4.A, 3.1.A, 5.2.B
Read, Anne-Marie	1.1.A
Rearden, Patsy	1.1.B
Reay, Michele	1.1.A
Reback, Mark	1.1.A
Reddick, Helen	1.1.B
Redfern, Mitch	1.1.A
Redford, Lois	1.1.A
Rees, Ryan	1.1.B
Reetz, Anita	1.1.A
Reeves, Mirella	1.1.B
Ren, Eli	1.1.A
Repiya, Valentina	1.1.B
Reutter, Laura	1.1.A
Rex	1.1.B
Rhoadarmer, Mildred	1.1.B
Rice, Dennis	1.1.A
Richards, Judy	1.1.B
Richman, Elise	1.1.A
Richmond, Katherine	1.1.B
Rickard, Mariana	1.1.B
Riddle, Carolyn	1.1.A
Ring, Susan	1.1.A

Commenter	Comment Topic
Roberts, Chris	1.1.B
Roberts, Ctad	1.1.B
Roberts, Cynthia	1.1.A
Roberts, Dave	2.2.D
Roberts, Dejch	1.1.B
Roberts, Jessica	1.1.B
Roberts, Sally	1.1.A
Robinson, Dorene	1.1.A
Robinson, Sharon	1.1.A
Rocio	1.1.B
Rodiscuz, Denise	1.1.A
Rodriguez, Anel	1.1.B
Rogeness, Lorene	1.1.B
Rogers, Rex	1.1.B
Rogers, Ruezlon	1.1.B
Rohrbach, Eric	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 3.1.A
Roller, Mark and Barbara	1.1.A
Romanenko, Tetiane	1.1.B
Romanenko, Valentin	1.1.B
Romaneva, Zara	1.1.B
Rome, Ramona	1.1.B
Ronald	1.1.A
Roscoe, John	3.1.A
Rose, Diane	1.1.A
Rose, Noreen	1.1.B
Roseburg, Valentina	1.1.B
Ross, Cameron	1.1.B
Ross, Harold	1.1.B
Rowan, Ella	1.1.A
Royal, Sanna	1.1.B
Rudd, Kristi	1.1.B
Rudin, Hannah	1.1.A
Rudner, Sergey	1.1.B
Rudneva, Tatiana	1.1.B
Rudnitsky, Uasily	1.1.B
Rudolf, Steven	1.1.A
Rupakno, R	1.1.B
Rushing, Adam	1.1.A
Rushing, Ashley	1.1.A
Rushing, Daniel J	1.1.A

Commenter	Comment Topic
Rushing, Samuel	1.1.A
Russell, April	1.1.B
Russu, Olga	1.1.B
Rutkovskiy, I	1.1.B
Rutty, Robin	1.1.B
Ryan, Jennifer	1.1.B
Ryan, Katherine	1.1.A
Ryan, Micky	1.1.D
Ryan, William	1.1.A
Rybok, Dmytro	1.1.B
S	1.1.B
S	1.1.B
S, A	1.1.B
S, Alina	1.1.B
S, Debbie	1.1.B
S, Gennadiy	1.1.B
S, Jaira	1.1.B
S, Jamie	1.1.B
S, L	1.1.B
S, Lee	1.1.B
S, Mykhoila	1.1.B
S, Nadezhda	1.1.B
S, P	1.1.B
S, S	1.1.B
S, Y	1.1.B
Sabrina	1.1.B
Sack, Barbara	1.1.A
Sadiki, Alla	1.1.B
Sadovy, Vlad	1.1.B
Saiwz, Levi	1.1.A
Salazar, Carolina	1.1.B
Salisbury, Nelson	1.1.A
Salmons, Dianne	1.1.B
Saltvick, Brian	2.1.J, 2.2.D
Saltvick, Michael	2.2.D
Samish Indian Nation (Todd Woodard)	1.1.C
Samolouov, H	1.1.B
Sand, Shanae	1.1.B
Sandaul, Janet	1.1.A

Commenter	Comment Topic
Sanders, Diane	1.1.B
Sandoval, Brayan	1.1.B
Sandra	1.1.A
Sanjay, Namratha	1.1.A
Sapelnikov, V	1.1.B
Sara	1.1.A
Sarackman, Inna	1.1.B
Sarah	1.1.A
Sarajzhrizi, Zantin	1.1.B
Sarthard, Brandy	1.1.B
Sauber, Wendy	1.1.B
Saum, Renee	1.1.B
Savage, Tessa	1.1.B
Savchik, L	1.1.B
Savin, Mikhail	1.1.B
Saxton's Timber Farm and Sanctuary, LLC (Darrell Saxton)	2.2.D
Schaaf, Karen	1.1.A
Schempp, Sylvia	1.1.B
Scheunemann, Anita	1.1.A
Schlictina, Betty	1.1.B
Schmidt, Bernard	1.1.B
Schoen, Rick	1.1.A
Schradi, Mary Ann	1.1.A
Schrag, Rosalyn	1.1.B
Schroeder, Beverly	1.1.B
Schroer, Abraham	1.1.B
Schroer, Gulnara	1.1.B
Schroer, William	1.1.B
Schuelke, Cheryl	1.1.A
Schuelke, Lindsay	1.1.A
Seater, Kim	1.1.A
Sebok, Freida	1.1.B
Sees, Verutte	1.1.B
Seese, Norma	1.1.B
Seibel, Tia	1.1.B
Seil, Wilma	1.1.B
Semenko, Fedor	1.1.B
Semenko, Nelli	1.1.B

Commenter	Comment Topic
Sen, Mv\$dchen	1.1.B
Senchenko, Yuriy	1.1.B
Senchuk, Irina	1.1.B
Senchuk, Stan	1.1.B
Senckun, Nadezhado	1.1.B
Sereda, Inna	1.1.B
Sergey	1.1.B
Sergneri, Gilda	1.1.B
Serniotti, Kristin	1.1.A
Serpanos, Inna	1.1.B
Serrano, M	1.1.B
Sexton, Sheila	1.1.B
Shablevsky, Gabriela	1.1.B
Shafer, David	1.1.B
Shafransky, Paula	1.1.A
Shamray, Liya	1.1.B
Shaney, Mlissa	1.1.B
Sharon	1.1.A
Shatoiya	1.1.A
Shcherbatova, Inna	1.1.B
Shchergatov, Yeher	1.1.B
Sheng, Ling Zhi	1.1.B
Shepard, Ellie	1.1.B
Shershen, Alona	1.1.B
Sheryko, Nataliye	1.1.B
Sheulishov, Ivan	1.1.B
Shevchuk, Natalya	1.1.B
Shiah, David	1.1.A
Shields, Tom	2.2.D
Shkarin, Dennis	1.1.B
Shore, Patricia	1.1.A
Shpak, Pavel	1.1.B
Shuets, Inna	1.1.B
Shurgot, Michael	1.1.A
Shutz, V	1.1.B
Siebert, Josephine	1.1.B
Siegel, Nancy	1.1.D
Sierra Pacific Industries (John Gold)	2.1.G, 2.3.A, 2.3.E, 2.4.A, 2.4.B, 3.1.A, 3.1.B, 3.1.C, 3.1.D, 3.2.A, 3.2.B, 3.2.C, 3.2.D, 3.2.F, 3.2.G, 4.3.D, 4.3.G, 4.5.A, 5.2.A, 5.2.B

Commenter	Comment Topic
Simmler, Todd	1.1.D
Simmons, Cheryl	1.1.A
Simonyan, Lolita	1.1.B
Singer, Caitlin	1.1.A
Sinker, Jeff	1.1.C
Sinker, Mary	1.1.C
Sivachev, Ruth	1.1.B
Sivachev, Rutie	1.1.B
Sivachev, Yelena	1.1.B
Skagit County Commissioners (Ron Wesen)	2.1.G, 2.1.I, 3.1.A, 3.2.A, 3.2.B, 3.2.D, 3.2.E, 3.3.A, 3.3.B, 3.3.C, 4.1.A, 4.1.C
Skagit County Farm Bureau (William Schmidt)	2.2.A, 2.2.D, 2.3.A
Skamania County Board of Commissioners (Richard Mahar, TW Lannen, Asa Leckie)	2.1.J, 2.2.A, 2.2.D, 2.3.A, 2.3.I, 2.4.D, 4.1.B, 4.4.A, 5.3.A
Skinner, Ann	1.1.C
Skobyak, Liubov	1.1.B
Slaughter, Tammy	1.1.B
Slepski, Joseph	1.1.A
Sletner, Jettrell	1.1.B
Slipper, Fred	1.1.B
Slipper, Suzette	1.1.B
Slisenko, Julia	1.1.B
SM, Rakshith	1.1.A
Smallman, Tammy	1.1.B
Smith, Chelsea	1.1.B
Smith, Donna	1.1.B
Smith, Heidi	1.1.B
Smith, Melissa	1.1.B
Smith, Nick	1.1.A
Smith, Scott	1.1.A
Smith, Shon (Chelan County Commissioner)	2.1.G
Smithgall, Molly	1.1.B
Smithing, Robert	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.A, 2.2.D, 2.3.A, 2.4.A, 3.1.A
Smythe, Alice	1.1.B
Snezhvo, N	1.1.B

Commenter	Comment Topic
Sneznko, Y	1.1.B
Snow, Blaine	1.1.A
Soap Lake Conservancy (Judith Gorman)	1.1.B
Soap Lake Conservancy (Judith Gorman)	1.1.B
Soap Lake Conservancy (On behalf of Kathy Kiefer)	1.1.B
Soap Lake Natural Spa & Resort (Sherry Xiao)	1.1.B
Sollmen, Ryann	1.1.B
Solomon, Diane	1.1.A
Solomon, Evan	1.1.B
Solomon, Laurie	1.1.D
Solomon, Samantha	1.1.A
Somess, Ar	1.1.A
Sonnichsen, Shirley	1.1.A
Sorem, Shannon	1.1.A
Sorienko, Mariia	1.1.B
Sorienko, Volodymyr	1.1.B
Sorolcina, Anastasia	1.1.A
Sosaparon, Arantxa	1.1.A
Sosaparon, Dominique	1.1.A
Soshenko, Anatolii	1.1.B
Soshenko, Larysa	1.1.B
Soule, Jeff	1.1.A
Southwick, Nancy	1.1.B
Soutter, Mark	1.1.A
Sowr, Ruth	1.1.B
Spaulding, Elizabeth	1.1.A
Species, Scott	1.1.A
Spencer, Judy	1.1.B
Spiess, Maria	1.1.B
Spurling, Leslie	1.1.A
Stakhovich, Galina	1.1.B
Stakhovich, Sergey	1.1.B
Staley, Sheri	1.1.A
Stanovich, Dianne	1.1.B
Stargell, Aubrey	2.1.G, 3.1.A, 3.3.B, 5.3.B
Starkin, Donald J	1.1.A
Stasyuk, Yakov	1.1.B

Commenter	Comment Topic
Wagoner, Keith (State Senator 39th District)	2.1.G, 4.4.A
Stauss, Eileen	1.1.A
Stebbins, Susan C	1.1.A
Stefano, Lori	1.1.A
Stelsiuk, Pavlo	1.1.B
Stendera, John	1.1.B
stensgar, John	1.1.B
Stepanak, Natalia	1.1.B
Stephen Dale	1.1.A
Sterling, Alice	1.1.B
Stetler, David	1.1.A
Stevens, Ashten	1.1.B
Stieber, Frank	1.1.A
Stienbarger, Doug	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 2.4.C, 3.1.A, 5.3.B
Stiglich, Lynn	1.1.A
Stokle, Marci	1.1.B
Stollov, Kristin	1.1.B
Stowe, Kathy	1.1.B
Stowe, Mike	1.1.B
Stowe, Mikiya	1.1.B
Stratton, Victoria	1.1.A
Strom, Eric	2.1.D, 2.1.F, 2.1.J, 2.2.D, 2.3.A, 3.1.A
Strong, Sabrina	1.1.B
Stuart	1.1.A
Stulnack, Scott	1.1.A
Stupika, Galina	1.1.B
Stupnytska, Iryna	1.1.B
Suarez, Salvador	1.1.B
Sudar, Lisa	2.1.A, 2.1.D, 2.1.F, 2.1.J, 2.2.D
Suk, Mariya	1.1.B
Sule, Helen	1.1.B
Susan	1.1.A
Sutton, Marsha	1.1.B
Suzanne	1.1.A
Svetlana, Lukeshova	1.1.B
Svetlana, Pavliy	1.1.B
Sviridovich, Alex	1.1.B
Swanson, Melissa	1.1.B
Swanson, Ryan	1.1.A

Commenter	Comment Topic
Swartz, Lesa	1.1.B
Swartz, R	1.1.B
Swedeen, Paula	1.1.A
Sweeney, Brian	2.2.A, 2.2.D
Swift, Hally	1.1.A
Swift, Lauren	1.1.A
Swope, J Michelle	1.1.A
Symonchuk, David	1.1.B
Symonchuk, L	1.1.B
Symonchuk, Vasyl	1.1.B
Synyuk, Olga	1.1.B
Synyuk, Petro	1.1.B
Syrykh, Evelyn	1.1.B
Syrykh, Jasmine	1.1.B
Syrykh, Kakili	1.1.B
T, C	1.1.B
T, H	1.1.B
T, Kathleen	1.1.B
T, R	1.1.B
T, S	1.1.B
Tabakar, Olekfandra	1.1.B
Talbot, Addie	1.1.B
Talbot, Kara	1.1.B
Talking Rocks Outdoor Company (John McLarty)	1.1.A
Tarikian, Azad	1.1.B
Tatarchuk, Tatiana	1.1.B
Tatiana, Runova	1.1.B
Tatum, Ethan	1.1.B
Taylor, Leslie	1.1.A, 1.1.B
Teed, Cornelia	1.1.A
Tefft-Meeker, Ian	1.1.A
Tenefrancia, Melissa	1.1.B
Tennyson, Kristine	1.1.A
Tenone, Anne Marie	1.1.B
Teotonio, Frederique	1.1.B
Terekhin, Nadczhola	1.1.B
Terekhin, Nikolay	1.1.B
Terekhina, Liubov	1.1.B
Tesleuko, Tetyana	1.1.B

Commenter	Comment Topic
Teter, Patricia	1.1.B
Tetiana	1.1.B
Thal, Alexzandra	1.1.A
The Molpus Woodlands Group, LLC (Ruth Cook)	2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 3.1.A
The Nature Conservancy in Washington (Justin Allegro)	1.1.A
The Pew Charitable Trusts (Brett Swift)	1.1.A
Thiede, Hanne	1.1.D
Thiel, Susan	1.1.A
Thomas, Joanne	1.1.B
Thompson, Amy	1.1.B
Thompson, Brad	1.1.A
Thompson, Gayle	2.1.J, 4.4.A
Thompson, Janet	1.1.A
Thoneton, Carole	1.1.B
Thoren, Pat	1.1.B
Thornsbury, Jean	1.1.A
Thorp Rowin, Shari	1.1.B
Tillum, Morgan	1.1.B
Tischenko, Nikita	1.1.B
Tischenko, Pavel	1.1.B
Tischenko, Sasha	1.1.B
Tischenko, Victoria	1.1.B
Titeu, Pavel	1.1.B
Titov, Anna	1.1.B
Tjersland, Tory	1.1.A
Tkach, Anna	1.1.B
Tkachov, Anatoliy	1.1.B
Tkachova, Olena	1.1.B
Tobiason, Ruthann	1.1.B
Tommer, Donna	1.1.B
Tonyuk, Lyuda	1.1.B
Toro, Flan	1.1.B
Tracy, Julian B	1.1.A
Trantham, Kathi	1.1.A
Tranthan, Kathi	1.1.B
Trayford, James	1.1.A
Treadway, Carolyn	1.1.A

Commenter	Comment Topic
Treperinas, Thelina	1.1.B
Trofimovich, Erik	1.1.B
Tsykaliuk, Anatolii	1.1.B
Tsymbalyuk, Dimytro	1.1.B
Tsymbalyuk, Mykola	1.1.B
Tsymbalyuk, Roman	1.1.B
Tumur, Tunga	1.1.B
Turcan, Alex	1.1.B
Turcan, Gabe	1.1.B
Turcan, Nicolina	1.1.B
Turner, Kent	1.1.C
Turpin, Jo	1.1.A
Tuttle, Naomi	1.1.A
Tyrrell, Kathie	1.1.A
U.S. Environmental Protection Agency (Lindsay Guzzo)	4.1.G, 4.7.D, 4.7.E, 4.7.F, 5.4.A
Underwood Ranch, LLC (Kurt Underwood)	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.3.F, 2.4.A, 4.4.A, 5.3.B
Underwood-H, Leslie	1.1.B
Uniak, Tom (Washington Wild)	1.1.C
Upper Skagit Indian Tribe	1.1.C
Urias, Victoria	1.1.A
Uribo, Bob	1.1.B
Usach, N	1.1.B
V	1.1.B
V, A	1.1.B
V, B	1.1.B
V, Christine	1.1.B
V, V	1.1.B
V, Yevgeniy	1.1.B
Vales, Frank	1.1.B
Valleriia, Merrovich	1.1.B
Van Dyk, Larry	1.1.B
VanAlyne, Emily	1.1.A
Vancouver Audubon Society (Susan Saul)	1.1.D
VanderBilt, Monty	1.1.A
Vangas, Ramiko	1.1.A
Varava, Natalia	1.1.B

Commenter	Comment Topic
Vasquez, Robert	1.1.A
Vasylevych, Venessa	1.1.B
Vechirko, Olena	1.1.B
Vechtomova, Marina	1.1.B
Velykoretskykh, Oleksiy	1.1.B
Velykoretskykh, Vira	1.1.B
Venable, Brian	1.1.A
Vera	1.1.B
Verbarendse, Krysta	2.1.J, 2.2.A, 2.2.D, 2.3.A, 2.3.C, 2.3.F
Verbarendse, Steve	2.1.J, 2.2.A, 2.3.A
Veria	1.1.B
Veselukha, Nataliya	1.1.B
Veselukha, Samiel	1.1.B
Veselukha, Vasyl	1.1.B
Vesper, Lidiya	1.1.B
Vianikov, Aleksandr	1.1.B
Victor	1.1.B
Victoria	1.1.A
Vikioriya, Poirskaiya	1.1.B
Viktor, Glinyk	1.1.B
Viktor, S	1.1.B
Vilkhovetskaya, Lyudmila	1.1.B
Villalta, Brandy	1.1.B
Villano, Chadra	1.1.B
Vimbinetti-Hutton, Austin	1.1.A
Vinnikova, Liliya	1.1.B
Vista, Katie	1.1.A
Vista, Lucas	1.1.A
Vlad	1.1.B
Vlianova, Dina	1.1.B
Vo, H	1.1.B
Vogt, Niki	1.1.A
Volozin, Andrey	1.1.B
Volozin, Carina	1.1.B
Volozin, Renata	1.1.B
Volozina, Olga	1.1.B
Voss, Barbara	1.1.A
Voznily, Andrew	1.1.B
Vucinovich, Joseph	1.1.A
Vusylenno, H	1.1.B

Commenter	Comment Topic
W, Cindy	1.1.B
W, Jo	1.1.B
W, Kendl	1.1.B
Wade, Ruth	1.1.B
Wagner, Kimberly	1.1.B
Wahl, Rose	1.1.B
Wainwright-Feldman, Sara	1.1.B
Wallace, Nadine	1.1.A
Walley, Gretchen	1.1.B
Wally	1.1.A
Walther	1.1.A
Waltz, Melissa	1.1.A
Walzer, Ben	1.1.C
Wandler, Gerald	1.1.B
Wang, Andy	1.1.B
Ward, Ilona	1.1.B
Ward, Mike	1.1.B
Ward-DuBois, Ben	1.1.A
Warns, Ray	1.1.B
Warriors, Kelly	1.1.A
Washington Forest Protection Association (Darin Cramer)	2.1.F, 2.1.G, 2.1.J, 2.2.A, 2.2.D, 2.3.A, 2.3.C, 2.3.F, 2.4.A, 2.4.C, 3.1.A, 5.2.B, 5.3.B
Washington Native Plant Society	1.1.A
Washington Wild	1.1.A
Way, Gary	1.1.B
Way, Joyce	1.1.B
Washington Department of Fish and Wildlife (Margen Carlson)	1.1.A
Webster, Gary	1.1.D
Webster, Josh	1.1.B
Weis, Marie	1.1.A
Weiss, Richard	1.1.A
Welch, Annabelle	1.1.B
Weseman, Lisa	1.1.A
Wesley	1.1.A
Wesson, Robert	1.1.B
West, M	1.1.A
Westergreen, Tom	2.1.G, 3.3.B, 4.3.G

Commenter	Comment Topic
Western Washington Agricultural Association (Kara Rowe)	2.1.J, 4.4.D
Western Washington University (John McLaughlin)	1.1.A
Weyer, Dora	1.1.A
Whatcom County Democrats (Andrew Reding)	1.1.A
Whitacre, Terri	1.1.B
White, Bruce	1.1.A
White, Christina	1.1.B
White, Eric	1.1.A
White, Kimberly	1.1.B
White, Nancy	1.1.A
White, Veronica	1.1.A
Whitehouse, Karl	1.1.B
Whitesides, Jeanne	1.1.A
Whitmore, Richard	2.1.J
Wick, Dale	1.1.E
Widell, Gail	1.1.A
Wieburg, Trent	1.1.A
Wiederspan, Evan	1.1.D
Wiegers, Sam	1.1.B
Wilcox, Jane	1.1.D
Wilfing, Janice	1.1.A
Williams, James	1.1.A
Williams, Jason	1.1.A
Williamson, Tammy	1.1.B
Willis, Arnold	1.1.B
Willis, Sharon	1.1.B
Wilson, Howard	2.1.J, 2.3.A, 2.3.F, 4.3.B
Wilson, Kathy	1.1.A
Wilson, Mary	1.1.B
Wilson, Steve	1.1.A
Wilstein, Christine	1.1.B
Wing, Gene	1.1.B
Winkelman, Brittany	1.1.A
Winkelman, Ryan	1.1.A
Winkes, Anne	1.1.C

Commenter	Comment Topic
Winnekins, Gavin	1.1.A
Winslow, Robert	2.3.A
Winter, Kelly	1.1.A
Wise, Russell	1.1.A
Wiseman, Colin	1.1.A
Wisniowicz, Kimberly	1.1.B
Witter, Patricia Lee	2.1.F, 2.1.J
Wixom, Mitch	1.1.A
Wolf, Deanna	2.3.A
Wolf, Melissa	1.1.B
Wolf, Shane	1.1.B
Wolfe, Shane	1.1.B
Wollett, Fritz	1.1.A
Wood, Glen	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.4.C, 3.1.A, 5.2.B, 5.3.B
Wood, Lauren	1.1.B
Wood, Rachel	1.1.A
Woodhouse, Karen	1.1.B
Woodlee, Brad	1.1.A
Woods, Cheryl	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.4.C, 3.1.A, 5.2.B, 5.3.B
Woods, Mike	2.1.D, 2.1.F, 2.1.G, 2.1.J, 2.2.D, 2.3.A, 2.3.C, 2.4.C, 3.1.A, 5.2.B, 5.3.B
Woodward, Denise	1.1.B
Woolpert, Steven	1.1.A
Worlock, Dylan	2.2.A, 2.2.D
Wuensch, Deb	1.1.B
Wyllie-Cain, Samuel	1.1.A
Xaver, Andrea	2.1.J
Xolic, Evelin	1.1.A
Y, Alex	1.1.B
Y, Dmitri	1.1.B
Y, Inna	1.1.B
Yamasheva, Nataliya	1.1.B
Yamrick, June	1.1.A
Yaroschuk, Inna	1.1.B
Yaroshehuk, Leonid	1.1.B
Yaroshenk, Volodnigr	1.1.B
Yelchan, D	1.1.B
Yesemenko, Alena	1.1.B

Commenter	Comment Topic
Yoon, Andrew	1.1.A
Yortskovskoya, Zina	1.1.B
Young, KC	1.1.A
Yount, Tura	1.1.B
Yureni	1.1.B
Yuriy	1.1.B
Z, Brenda	1.1.B
Z, Frances	1.1.B
Z, Peter	1.1.B
Z, Tatyana	1.1.B
Zahn, Andy	1.1.D
Zahn, Laurien	1.1.D
Zahn, Nancy	1.1.D
Zakhariya, Leonid	1.1.B
Zakhariya, Mykonis	1.1.B
Zakhariya, N	1.1.B
Zakhariya, Natalia	1.1.B
Zakhariya, Ronan	1.1.B
Zakhariya, Vira	1.1.B
Zakharov, Alexander	1.1.B
Zakharova, L	1.1.B
Zakhrabova, Metanet	1.1.B
Zanol, Jane	1.1.E
Zapotinna, Roksolana	1.1.B
Zaszob	1.1.B
Zelenchuk, Anna	1.1.B
Zhdanov, Igor	1.1.B
Zhong, Tiffany	1.1.B
Zhou, Lei	1.1.B
Zhuang, Ellen	1.1.A
Zhukova,	1.1.B
Zhupakenko, Vira	1.1.B
Zhuravbev, Vladimir	1.1.B
Zigelboym, Yakov	1.1.B
Zimmerman, Trudy	1.1.A
Zinchenko, Aleksandr	1.1.B
Zinchenko, Victoria	1.1.B
Zontek, Kenneth	1.1.A
Zubrad, Donna	1.1.B
Zui, Juliia	1.1.B

Commenter	Comment Topic
Zuniga, Zach	1.1.A
Zyskowski, Stanley	1.1.A

Appendix C List of Commenters under Section 1.1

Support Additional Protections

Due to the high volume of support and need to keep the CES readable, the list of names of commentors with comments supporting the ORW rulemaking are listed below. The response to these comments are in section 1.1.

1.1.A Commenters

These commenters support additional protections for multiple ORWs and highlight benefits of an ORW designation.

- Ab, Nando
- Adams, Marsha
- Adina
- Adrian
- Aguirre, Maria
- Aiken, Randi
- Alder, John
- Aldrich, Sandi
- Alford, Jeff
- Allegro, Justin
- Alspach, Ken
- Ambre, Erin
- Amy
- Anderson, Kevin
- Anderson, Lyle
- Andrade, Becky
- Andrews, Kaylee
- Anna Laurie
- Antoinette
- Aquino, Joshualyn
- Aquino, Joyce
- Aryal, Riya
- Atkinson, Martha
- Ayuso, Siabhon
- Baer, Richard
- Bahr, Dennis
- Bailey, Stephen
- Baird, Peter
- Baker, Norman
- Bakke, Susan
- Barbara
- Barbara
- Barcott, Nick
- Barry
- Bartley, William
- Bartow, Sally
- Bascom, Anna
- Bass, Travis
- Bauman, Sarah
- Beasley, George
- Beatty, Danny
- Beaty, Caylen
- Beauman, Richard
- Behle, Brian
- Beldin, Joan
- Benedict, Derek
- Benham, Rebekah
- Bentzel, Jen
- Berg, Mackenzie
- Bergstrom Falendysz, Heather
- Bernal, Paul
- Bertram, Trey
- Billings, Lisa
- Billings, Suzanne
- Bivins, Michele
- Blackwood, Barbara
- Blitzer, Mark
- Boaterre, Qat
- Bob
- Boler, Marguerite
- Bouton, Vedille
- Bowers, Richard
- Brandenburg, Ann
- Bray, Sarah

- Brown, Derek
- Brown, Ian
- Brown, Robert
- Brown, Tina
- Bruce
- Bryan
- Bryant, Anita
- Buchan, William
- Buer, Eric
- Bui, Casey
- Burden, Lys
- Burgess, Sara
- Burr, Eric
- Burton, Billy
- Burton, Gay
- Butcher, Deanna
- Capan, Cigdem
- Carlsen, Steven
- Carlson, Amy
- Carlson, Cheri
- Carlson, Margen
- carole
- Carolyn
- Carpio, Juan
- Carroll, Linda
- Carrothers, David
- Cassato, Candice
- Castillo, Olivia
- Chadwick, John
- Chamale, Jennifer
- Washington Wild (Chappell, Chris)
- Chappell, Christopher
- Charles, David
- Charles, Jason
- Chessin, M
- Chew, Carl
- Clark, Jennifer
- Clark, Kevin
- Clayton
- Clingman, Harter
- Coffin-Greenig, Cindy
- Colby, Caitlyn
- Coleman
- Coles, Margie
- Collins, Tamela
- Collins, Theresa
- Colson, Lynn
- Comanor, Kyle
- Connell, Patricia
- Corrigan, Jennifer
- Corso, John
- Cortis, Mario
- Cotton, Tish
- cowan, Brian
- Cox, David
- Crawford, Sydney
- Crawford, Wanda
- Crocker, David
- Cross, Kelsey
- Crowley, Marty
- Curran, Ben
- Curtis, Richard
- Dale, Stephen
- Dalluge, Elisia
- darst, dolores
- Davis, Virginia
- de Give, Anita
- Deal, Brandie
- Deaver, Joseph
- Deborah
- DeSimone, Betsy
- Desiree
- Dick, Katarina
- Dickinson, Amanda
- DiLabio, Gena
- Dixon, Angie
- Don
- Donna
- Dorothy
- Doss, Annie
- Douglass, Andronetta
- Downey, Judith
- Dowson, Eleanor
- Doyel, Alice
- Dragon, Water
- Dronen, Amy

- Dronen, Mark
- Duane
- Dunn, Sharon
- Easter, Tara
- Eaton, Patrick
- Echelbarger, Denise Marie
- Ed
- Efron, Deborah
- Eir, Cheri
- Eklund, Glenn
- Eldridge, Sara
- Elena
- Eliuk, Jennifer
- Elizabeth
- Elizabeth
- Ellen
- Ellingson, Karissa
- Elmendorf, Phyllis
- English, Connor
- Ennis, Ron
- Erbs, Lori
- Eskenazi, Penny
- Espe, Greg
- Evans, Bee
- Evans, Bronwen
- Evans, Sally
- Eventyr, Kirstin
- Fairchild, Jennifer
- Felts, Terry
- Feng, Ming
- Fenner, Philip
- Fierro, Tallia
- Fiorani-Campbell, Frederique
- Fischer, Sarah
- Fisher, Charel
- Fisher, Dennis
- Fitch, Athena
- Fleener, Teresa
- Folsom, Todd
- Forman, Tyler
- Foster, Brooks
- Franks, Larry
- Fred
- Friel, Richard
- Frutiger, Christina
- Furey, Tom
- Galbraith, Jessica
- Galeena, Gumaro
- Gallagher, Liam
- Gamsjager, Austin
- Garand, Anthony
- Gardner, Jennifer
- Geiger, Craig
- Generoso, Erika
- Getz, Jade
- Gigliotti, Katrina
- Gisselberg, Susan
- Goedecke, Christine
- Gogic, Laurie
- Gordon, J W
- Gordon, Marcy
- Graham, Molly
- Grajczyk, Joyce
- Graleona, Daniel
- Green, Steve
- Greg
- Grelock-Yusem, David
- Guerrero, Peter
- Guillory, Chris
- Gulick, Amy
- H, Carole
- h, f
- h, j
- H., L.
- Hafer, Sarah
- Halseth, Glenn
- Hamid, Devin
- Hamid, Zaki
- Hancock, Matt
- Hardwick, R Alan
- Harmon, Susan
- Harper, Gwendolyn
- Harper, Robin
- Harry
- Harryton, Andrew
- Hartley, Michael

- Harty, Florence
- Harvey, Jo
- Harvey, Rhea
- Heavyrunner, Mia
- Heidel, Ed
- Hemphill, Patricia Joan
- Henling, Daniel
- Henneghan, Patrick
- Heywood, Susan
- Highberg, Laura
- Hildebrandt, Marysue
- Hill, Michael and Barbara
- Hirsely, Dustin
- Hisham
- Hoex, Chris
- Hoff, Marilyn
- Hoffman, Marie
- Holcomb, Hayley
- Hollenbeck, Denise
- Holmquist, Stephanie
- Holtzman, Julie
- Hong, Kay
- Hong, Kha
- Hong, Lynn
- Hovenkotter, Kirk
- Hubbard, Valerie
- Hudson, Dorothy
- Huie, Marcia
- Isakson, Jenna
- Itel, Don
- Jacobs, Nancy
- Jacobson, Robin
- James
- James, Hansen
- James, Karen
- Janelle
- Jaspers, Jade
- Jaspers, Janet
- Jeannie
- Jeannie
- Jennings, Tasceai
- Jensen, Antoinette
- Jensen, Jean
- Jerry
- Jerskey, Paul
- Jessica
- Joanne
- Joe
- John
- Johnson, Jeff
- Jokela, Mary
- Jonas, Jayme
- Jones, Clayton
- Jordan, Dorothy
- Journey, Cyndy
- Juhre, Sue
- Julia
- Juliette
- June
- Kaija
- Kane, Edward
- Kathy
- Katz, Naomi
- Kaye, Deborah
- Keeler, Timothy
- Keller, Gerald
- Kelly, Patrick
- Kemper, Mari
- Kemper, Will
- Kendall, Lydia
- Kenny, Daniel
- Keyes, Jeannie
- Khalil, Ra'id
- Kihlstrom, Liz
- Klein, Leila
- Klenke, Phillip
- Knickmeyer, Jared
- Knowles, Lorelette
- Korn, Meryle A.
- Kostanich, Trevor
- Kraus, Kelly
- Kraushaar, Sunday
- Krieger, Kim
- Krista
- Kronenberger, Eliza
- kuhn, susan

- Kumas, Nikhil
- Kumma, Beth
- Kumma, Maddie
- Kumma, Norm
- Laing, Steve
- Lamb, Barbara
- LaMorticella, Tony
- Lampard, Keith
- Lanyon, Ashley
- Larsen, Andrew
- Larsen, Kim
- Larson, Elizabeth
- LaRue, Erik
- Lattimore, Kristina
- Laura
- Laurel, Jesus
- Ledden, Dennis
- Lee, Vanessa
- LeGault, Rachel
- Leifker, Karen
- Leo
- Letienmayer, Alison
- Lin
- Lin
- Linda
- Linda
- Link-New, Virgene
- Lipsky, Nick
- Littleton, Cody
- Loeffler, Jonathan
- Lofton, Saab
- Loomis, Gregory
- Lord, Marisa
- Love, Bob
- Love, Kerri
- Lovejoy, Valerie
- Lynne
- Lyons, Alana Louise
- Mabbott, MaryAnn
- Madden, Rachel
- Magana, Maria
- Magner, Millie
- Mahannah, Christopher
- Mahder, Debbie
- Mahnke, Denise
- Mai
- Manns, Timothy
- Marchand, Joaquin
- Margo
- Marian
- Marianne
- Mark
- Marti, John
- Martin, Grey
- Martinez, Priscilla
- Mary
- Mary
- Mathews, Holger
- Matzke, Tina
- McAfee, Dennis
- Mccall, Vikki
- McCavern, Patrick
- McClintock, Gloria
- McConnor, AnnaMarie
- McDougall, Cassandra
- McGill, Jen
- McGivern, Mike
- McGrath, Ryan
- McLaughlin, John
- McManamen, John
- McMasters, Andrew
- Meek-Shively, Stephen
- Mel
- Merrell, Mary
- Michael and Barbara
- miller, barbara
- Miller, John
- Miller, Marcus
- Mirzaa, Ghayda
- Mo, Kristin
- Montgomery, Andrea
- Moore, Melissa
- Moore, Rosemary
- Morgan, Dan
- Mori, Lidia
- Morrill, Sean

- Morris, Jonathan
- Mower, Amy
- Moynhan, Samantha
- Muegge, Brian
- Mulcare, James
- Murgo, Linda
- Murphy, Peter
- Murphy, Tiffany
- Murray, Susanne
- Myers, Olin Jr
- Myette, Emily
- Nagyfy, Desiree
- Nancy
- Napp, Jeffrey
- Nauyani, Rahul
- Nava, Jorge
- Navarro, Nabor
- Neal, William
- Neese, Harvey
- Nelson, Katherine
- Newman, Monty
- NICOLAI, JANE
- Nobley, Craig
- Nolasco, Chris
- Nordlund, Shelley
- Nunez, Jose
- Nunez, Veronica
- Obispo, Liza
- O'Brien, Paula
- O'Brien, William
- O'Donald, Julie
- O'Keefe, Thomas
- Olson, Janis
- O'Neill, Devon
- Orr, M. Lou
- Osborne, Mark
- O'Shea, Mike
- Ostrer, Allison
- Ostrom, Anika
- O'Sullivan, Margaret
- Ouellette, Tracy
- Owen, Susan
- Padelford, Grace
- Palmer, Judy
- Palumbo, Julieann
- Panlasigui, Maricar
- Parker, Lance
- Parsley, Adina
- Payton, Fay
- Pedersen, Celia
- Perales, Carole
- Perkins, Lela
- Perron, Patricia
- Peters, Tara
- Peters, Thom
- Peterson, Barbara
- Peterson, Brock
- Phan, Ut
- Philip
- Pinon, Maria
- Post, Rebecca
- Potts, Paul
- Powers, Tom
- Pratt, Debbi
- Price, Terry
- Proctor, Gary
- Provost, Lin
- Pulliam, Chelsea
- Quinn-Shea, Daniel
- Quinn-Shea, Daniel
- r
- R, P
- Radelet-Stein, Persephine
- Rader, Patti
- Rainey, Laura
- Ralph
- Ratcliff, Philip
- Read, Anne-Marie
- Reay, Michele
- Reback, Mark
- Redfern, Mitch
- Redford, Lois
- Reding, Andrew
- Reetz, Anita
- Ren, Eli
- Reutter, Laura

- Rice, Dennis
- Richman, Elise
- Riddle, Carolyn
- Ring, Susan
- Roberts, Cynthia
- Roberts, Sally
- robinson, dorene
- Robinson, Sharon
- Rodiscuz, Denise
- Roller, Mark and Barbara
- Ronald
- Rose, Diane
- Rowan, Ella
- Rudin, Hannah
- Rushing, Adam
- Rushing, Ashley
- Rushing, Daniel J.
- Rushing, Samuel
- Ryan, Katherine
- Ryan, William
- Sack, Barbara
- Saiwz, Levi
- Salisbury, Nelson
- Sandaul, Janet
- Sandra
- Sanjay, Namratha
- Sara
- Sarah
- Schaaf, Karen
- Scheunemann, Anita
- Schoen, Rick
- Schradi, Mary Ann
- Schuelke, Cheryl
- Schuelke, Lindsay
- Seater, Kim
- Serniotti, Kristin
- Shafransky, Paula
- Sharon
- Shatoiya
- Shiah, David
- Shore, Patricia
- Shurgot, Michael
- Simmons, Cheryl
- Singer, Caitlin
- Slepski, Joseph
- SM, Rakshith
- Smith, Nick
- Smith, Scott
- Snow, Blaine
- Solomon, Diane
- Solomon, Samantha
- Somess, Ar
- Sonnichsen, Shirley
- Sorem, Shannon
- Sorolcina, Anastasia
- Sosaparon, Arantxa
- Sosaparon, Dominique
- Soule, Jeff
- Soutter, Mark
- Spaulding, Elizabeth
- Species, Scott
- Spurling, Leslie
- Staley, Sheri
- Starkin, Donald J
- Stauss, Eileen
- Stebbins, Susan C
- Stefano, Lori
- Stetler, David
- Stieber, Frank
- Stiglich, Lynn
- Stratton, Victoria
- Stuart
- Stulnack, Scott
- Susan
- Susan
- Susan
- Suzanne
- Suzanne
- Swanson, Ryan
- Swedeen, Paula
- Swift, Brett
- Swift, Hally
- Swift, Lauren
- Swope, J Michelle
- Teed, Cornelia
- Tefft-Meeker, Ian

- Tennyson, Kristine
- Thal, Alexzandra
- Thiel, Susan
- Thompson, Brad
- Thompson, Janet
- Thompson, Janet
- Thornsbury, Jean
- Tjersland, Tory
- Tracy, Julian B.
- Trayford, James
- Treadway, Carolyn
- Turpin, Jo
- Tuttle, Naomi
- Tyrrell, Kathie
- Uniack, Tom
- Urias, Victoria
- VanAlyne, Emily
- VanderBilt, Monty
- Vangas, Ramiko
- Vasquez, Robert
- Venable, Brian
- Victoria
- Vimbinetti-Hutton, Austin
- Vista, Katie
- Vista, Lucas
- Vogt, Niki
- Voss, Barbara
- Vucinovich, Joseph
- Wallace, Nadine
- Wally
- Walther
- Waltz, Melissa
- Ward-DuBois, Ben
- Warriors, Kelly
- Weis, Marie
- Weiss, Richard
- Weseman, Lisa
- Wesley
- West, M
- Weyer, Dora
- White, Bruce
- White, Eric
- White, Nancy
- White, Veronica
- Whitesides, Jeanne
- Widell, Gail
- Wieburg, Trent
- Wilfing, Janice
- Williams, James
- Williams, Jason
- Wilson, Kathy
- Wilson, Steve
- Winkelman, Brittany
- Winkelman, Ryan
- Winnekins, Gavin
- Winter, Kelly
- Wise, Russell
- Wiseman, Colin
- Wixom, Mitch
- Wollett, Fritz
- Wood, R
- Wood, Rachel
- Woodlee, Brad
- Woolpert, Steven
- Wyllie-Cain, Samuel
- Xolic, Evelin
- Yamrick, June
- Yoon, Andrew
- Young, KC
- Zhuang, Ellen
- Zimmerman, Trudy
- Zontek, Kenneth
- Zuniga, Zach
- Zyskowski, Stanley

1.1.B Commenters

These commenters support additional protections for Soap Lake as an ORW and highlight benefits of an ORW designation.

- A, Garcia
- A, L

- A, Lena
- A, Natalya
- A, Rimona
- A, Roman
- Abigail
- Abramson, Mary Ann
- Ackerman, Laura
- Adams, Michelle
- Adichek, Oleg
- Agliano, Michelle
- Agoshkov, Lucy
- Akimov, Eduard
- Akimov, Natalya
- Alaniz, David
- Aldna, Kvivchkova
- Aleksey, Polikarpov
- Alex, R
- Alexander, Maria
- Aliment, Dean
- Alley, Della
- Allison, Melana
- Amara, Mark
- Coulee Corridor Consortium (Amara, Mark)
- Amaya, Anna
- Amieux, Paul
- Amino, Kaitova
- Anastasiia
- Anderson, Debra
- Andrii, Polinko
- Andriyuk, Tamara
- Andrves, Scott
- Andy
- Angela, Christie
- Antouov, Y
- Apresovna, Avanesyan
- Argat, Andrei
- Arnautod, Michael
- Arriss, William
- Artem, Polishuk
- Artenga, Kevin
- Atkinson, Suellen
- Aubertin, Pat
- Avdeev, Uglin
- Ayers, Kristy
- Ayropetyzan, Artur
- Azul
- B
- B, A
- B, Alex
- B, Andrei
- B, Anna
- B, Aydrey
- B, Brian
- B, E
- B, Erika
- B, Inna
- B, Jennifer
- B, Mike
- B, Olga
- B, Russ
- B, Ryszovde
- B, Sarah
- B, Svetlana
- B, V
- B, Vera
- B, Y
- Babak, Anatoly
- Babak, Dima
- Babak, John
- Babak, Julia
- Babak, M
- Babar, Paul
- Babek, Ivan
- Bable, Tim
- Bagaveyev, Salikh
- Baker, Kaci
- Baker, Marcia
- Baker, Randy
- Baker, Terrie
- Baker-Jagla, Deborah
- Balhayer, Viktor
- Balhayeva, V
- Bambcela, Larisa
- Banar, Oleg
- Barbara

- Barduhn, Ann
- Barney, Cameron
- Barney, Dori
- Baty, Andrew
- Bauker, Thomas
- Bazyuk, Abby
- Bazyuk, David
- Bazyuk, Otes
- Beasley, Melinda
- Beckham, Mande
- Beckwith, E.
- Bell, Belina
- Belyaev, Valery
- Benbow, Debra
- Bendickson, Constance
- Bennett, Barb
- Benrck, Cheryl
- Bentley, Ginger
- Beregorg, Valentina
- Berg, Barney
- Berg, Georganne
- Berrman, Doug
- Berryman, Cassie
- Berryman, Zac
- Bertash, Vlad
- Bessarab, Diana
- Bessarab, E
- Bessarab, Elena
- Betzer, Ethan
- Bibokub, V
- Bickle, Barbara
- Bikhnyk, Karina
- Bilodeau, Dava
- Bilodeau, Jadon
- Bilogin, Svitlana
- Bishop, Heather
- Bishop, M. Kay
- Bjork, Ritz
- Blalock, Tamara
- Bledsoe, Brenda
- Bly, Comett
- Boesel, Pat
- Bondarenko, Alex
- Bondarenko, Lilly
- Bondarenko, Valerie
- Bondarenko, Victor
- Bordac, Olga
- Borg, Nels
- Borisov, Anna
- Borisov, Vlad
- Borovik, A
- Borovik, Alla
- Borovik, Andrey
- Borovik, Roza
- Borozdin, David
- Boryshkevych, Yelena
- Braaten, Misty
- Brado, Jill
- Brashnyk, Paul
- Brewer, Matthew
- Brichek, Gabe
- Bridges, Miranda
- Brizzi, Janet
- Brooks, Angela
- Browing, Joseph
- Brown Lee, Kevin
- Brown, Christie
- Brown, Christy
- Brown, Dan
- Brown, Denie
- Brown, Susan
- Bruehl, Judith
- Bryant, Laura
- Bryskie, Adam
- Bubak, John
- Buchanan, Emma
- Buchanan, Katie
- Buchanan, Katie Jo
- Buchanan, Madalyn
- Budd, James
- Budnik, Irina
- Budnik, Jess
- Budnik, Sam
- Bugaychuk, Vadim
- Buniatyan, David
- Buniatyan, Eduard

- Buniatyan, Naira
- Burks, Laura
- Burlak, Yelena
- Bush, Terri
- Butter, Dorothy
- C
- C, Dennis
- C, H
- C, Igor
- C, Inna
- C, Jerry
- C, Lidiya
- Camp, Deanna
- Campos, Rulina
- Capps, Renee
- Caputo, Dee
- Carpentier, Teri
- Carruth, Erin
- Carson, Susan
- Castro, Leo
- Castro, Tinisha
- Catlin, Sally
- Caylor, Barbara
- Cerrato, Deborah
- Cestro, Cesar
- Chambers, Dana
- Chambers, Jane
- Chambers, Joshua
- Chaprin, Olsa
- Chase, Jacquelyn
- Chavacko
- Cheek, Sandy
- Cherepiana, Kateryna
- Cherneta, Ivan
- Chernyavsigiy, Sergey
- Christie, Clayton
- Chudott, Judith
- Chuprin, Olga
- Church, Lorraine
- Clark, Donna
- Clark, Richard
- Clemmo, Sharon
- Click, Pat
- Clifford, Teri
- Close, Kathy
- Cockfield, Patti
- Cole, Tracy
- Comin, Peggy
- Compton, Marie
- Conkle, Michael
- Contreres, Samantha
- Cooke, Deana
- Cooke, Sandra
- Corona, Heidi
- Corso, Rose
- Cortez, Elizabeth
- Cosmari, Zimoyis
- Cosovan, Emme
- Cosovan, Nicolai
- Coughtry, Chairein
- Crandell, Michelle
- Crary, John
- Crivoi, R
- Crotsley, Tracy
- Crouch, Lisa
- Crummett, Diane
- Cummins, Robert
- Cunningham, Tessa
- D, Kozliuk
- D, N
- D, Nicole
- D, P
- D, Paul
- D, R
- D, Sergey
- D, T
- D, Tara
- D, Valentin
- D, Y
- D, Yekaterina
- Dahnke, Ingrid
- Daian, Anca
- Daniels, Melissa
- Dashkel, Alex
- Dashkel, Raise
- Davis, Brenda

- Davis, Debbie
- Davis, Loretta
- Davis, Vickie
- DeGooyer, Brett
- Dejar, Wendy
- Denise, Yana
- Dennis
- Dewey, Mary
- DeWitte, Fran
- Diakur, Lidiia
- Diaz, Joel
- Didur, Lidia
- Didur, Rosca
- Didyk, Natalia
- Dilbaryan, Gerorg
- DiStefano, Allison
- Divelbiss, Jessica
- Dlyayen, Anna
- Dondero Cohen, Taya
- Dondero-Cohen, Julian
- Dondero-Moss, Adriana
- Donsmore, Justin
- Doran-Turner, Tina
- Doroshchuk, Anatoliy
- Dotson, Curtis
- Duck, Jennifer
- Dudko, Alex
- DuPoy, Allen
- DuPuy, Allen
- Dvornaya, Lynbore
- E, Ghenadie
- ebaugh, janet
- Ebel, Bob
- Edwards, Robert
- Ellingson, Michael
- Erdmann, Felicity
- Erfurth, Joyce
- Erickson, Michael
- Esterer, Anna
- Evans, Darryl
- Evans, Joan
- Evans, Susan
- Evertsen, Ray
- F, A
- F, Nina
- F, Noelle
- F, S
- F, Wanda
- Faber, Rosemary
- Fancher, Elizabeth
- Farrar, Karen
- Fatov, Lyudmile
- Fatov, Vasiliy
- Faulkner, Natalie
- Fedas, Olivia
- Fedckyn, Fedir
- Fedckyn, Vira
- Fedus, Felix
- Fedus, Juliette
- Felicita, Angella
- Felton, Denis
- Ferry, Jane
- Fisenko, Alexander
- Fisenko, Lyvbov
- Fisher, Mary
- Fitzgerald, Jennifer
- Fleming, Clare
- Fletcher, Angel
- Fletcher, Robert
- Flower, Antonio
- Foote, Sheila
- Forester, Kathryn
- Forias, Elijah
- Forsman, David
- Fountain, Mark
- Fox, Kylie
- Frankov, Ivan
- Franz, Serenity
- Freeman, Elena
- Fulkerson, Melinda
- G, Abraham
- G, Deonna
- G, Dmitriy
- G, Evgenia
- G, I
- G, L

- G, Leslie
- G, N
- G, Naomi
- G, Natalia
- G, Osor
- G, P
- G, S
- G, Svetlana
- Gagova, V
- Gajewski, Dannah
- Galloway, Angela
- Gaponeneo
- Garcia, Vanessa
- Garrett, Robert
- Geer, Judy
- Geesey, Nina
- Gehling, William
- Geiss, Bailey
- Geiss, Chris
- Gensitskey, Nickolay
- Gerasimenko, Addie
- Gerasimenko, Julie
- Gerlach, Robin
- Get, Evelyn
- Gibson, Haylie
- Gibson, Roberta
- Gilbert de Vargas, Sally
- Gilbert, J
- Glushchenko, Larissa
- Glushchenko, V
- Golovko, Ella
- Gonzale, Frances
- Gonzalez, A
- Gonzalez, Eva
- Gonzalez, M
- Gonzalez, Martin
- Gonzolas, Donna
- Gooding, Alison
- Gorbachova, L
- Gorbunov, Vladimir
- Gordiyenko, Leonid
- Gordiyenko, Svetlana
- Gorka, Nellie
- Gorman, Judith, Pres. Of SL Conservancy
- Gould, Dan
- Gould, Megan
- Gravelle, Raymond
- Graves, John
- Gray, Paula
- Green, Allycia
- Green, Isabella
- Green, Olga
- Gregory, Bryon
- Griashtat, Vitaly
- Grigoryon, Greg
- Grikay, Vladimir
- Gruber, James
- Gruber, Ruth Ann
- Grudowski, Ted
- Gubarih, Nadezhda
- Gubarih, Vasilig
- Gugin, Patty
- H, Kamee
- H, Liudmyla
- H, Martin
- H, Nikolay
- H, R
- H, Tatiana
- H, Vickie
- Hall, Shana
- Hampt, Jalyn
- Hampton, Justin
- Haney, Dewey
- Hannaford, Shelly
- Hansen, Sherrie
- Hanson, Pam
- Harris, Carolyn
- Hasper, Beverly
- Hassenzasen, Parier
- Hasten, Connie
- Hatton, Mike
- Hausman, Todd
- Haworth, Casey
- Hayden, Nadya
- Hayes, Leanna

- Healthcare, McKay
- Heinrich, John
- Henderson, Colin
- Hernandez, Mer
- Hernandez, Romen
- Hill, Jim
- Hill, Shannon
- Hill, Tim
- Hirst, Ruby
- Hishchenko, Yev
- Hodge, M
- Hogan, Judi
- Hogan, Robert
- Holden
- Holm, Buzzy
- Holt-Morehouse, Bonnie
- Hooper, Kristin
- Howard, John
- Howlett, Cassandra
- Huber, Linda
- Huertes, Ryan
- Huff, Jamie
- Hummel, Kyoko
- Humphrey, Melody
- Hutsell, Rebecca
- Hutsell, Wayne
- Huxtable, Patricia
- I
- I, Valentina
- Iakevenko, Slitlana
- Ice Age Floods Institute, Lower Grand Coulee chapter (Denis Felton)
- Ignatenko, Alex
- Ignatenko, Sarah
- Inna, Shvager
- Ison, Oksana
- Israel, Luke, BA in Business SPU
- Ivanov, Peter
- Iyeruserlimets, Alex
- Izotova, Maria
- J, Martha
- Jackson, Cheryl
- Jahn, Nick
- James, Linda
- Janien, Angelina
- Janzen, Dimitri
- Jasperson, Apryl
- Jladimir
- Johnson, Hayleigh
- Johnson, Terra
- Johnston, Julie
- Jonathan
- Jones, Clayton
- Josephson, Deanna
- Judd, Annette
- K, A
- K, Edward
- K, Elizaveta
- K, Eugene
- K, Lyubov
- K, Maria
- K, Mavicja
- K, N
- K, Olena
- K, Olga
- K, Olpa
- K, Pepper
- K, Tetyana
- K, Tony
- K, V
- Kadoun, Debra
- Kaiser, Ramona
- Kangas, Roxanne
- Kasanov, Olga
- Kast, Jonathan
- Kastnee, Tammy
- Kastner, Karli
- Kataiina
- Katyukha, V
- Katz, Josh
- Kazak, G
- Keadle, Beth
- Kel
- Kelley, Chelsea
- Kelley, Kyree
- Kelley, Lydia

- Kelley, Michael
- Kelley, Zach
- Keptya, Sergey
- Key, Margaret
- Key, Patrick
- Key, Shelly
- Kiforishin, Yelena
- Kile, Mary
- King, Stacy Lee
- Kisel, Lyudmila
- Kisel, P
- Kitoyan, Aida
- Kitsen, Emma
- Knight, Lisa
- Knowles, Mary
- Knudsen, KS
- Koehn, Yulia
- Koliksh, Bogdan
- Koliksh, Mikhailik
- Koltunov, Simeon
- Kopochkin, Y
- Korotkova, Evgeniya
- Korson, Nadya
- Koss, Kathy
- Kostenko, Anatoly
- Kostenko, Nina
- Kosterva, Marina
- Kot, V
- Kotelneilrov, Zinaids
- Kouko, Didia
- Kovach, Alex
- Kovach, Mary
- Koval, Rurim
- Kovalenko, Yuriy
- Kovalyicer, Gelina
- Kovalyicer, Viktro
- Kovelova, Y
- Kozlov, Absalom
- Kozlov, Alexander
- Kozlov, Anna
- Kozlov, Jasime
- Kozlov, Nadezhda
- Kozlov, Nicolas
- Kozlov, Valentina
- Kramer, Kathleen
- Kravchuro, Sergey
- Kriete, Kenneth
- Krushelnytsba, Nataliya
- Kucherenko, Liedmyla
- Kurishko, Oleg
- Kurkov, Natasha
- Kurkov, Timofey
- Kuzmenko, Denis
- L
- L
- L, Alex
- L, I
- L, Ivan
- L, M
- L, N
- L, P
- L, Pavel
- L, Tatiana
- L, U
- Laban, Lovely
- Lagies, Melissa
- Lajtos, Kristina
- Lang, Shirley
- Langevin, Dori
- Lapiuk, Andrii
- Lawnicki, Gail
- Lee, Alice
- Lehman Miller, Beth
- Leibrand, Stella
- Leonard, Janet
- Leonov, George
- Lewis, Daniel
- Lewis, Jason
- Lewis, Sandra
- Liliya
- LilyAnn
- Lindenmeyer, Karen
- Little, Mildred
- Littleton, Marilyn
- Livbov, Scherbakova
- Lodianoy, Alexandr

- Lodianoy, Olga
- Loncarovich, Anna
- Long, Colleen
- Long, Don
- Love, Ranessa
- Lozko, Maryna
- Lukashova, Natalia
- Lupanov, Anna
- Lutsenko, Liudmyla
- Lutsenko, Yuliana
- Lysaya, Anita
- Lysyy, Vasilii
- M, Anna
- M, Joe
- M, Lidia
- M, M
- M, Madeline
- M, Maxim
- M, Olha
- M, Philip
- M, Sergey
- M, Valentyna
- M, Vasyl
- M, Yuriy
- Machuk, Anatolii
- Mackay, Carolyn
- Madden, Kari
- Madrigal, David
- Maher, James
- Maher, Tracy
- Mastruk, Olga
- Mastruk, Serbii
- Maksimekno, Anna
- Maksymyak, Oresta
- Mamko, Elena
- Mamko, Pavel
- Manita, Olga
- Manning, Joyce
- Manship, Joyce
- Mantsevich, Mikhail
- Marchand, Joaquin
- Marchuk, Anatolii
- Marina
- Marino, Robert
- Markley, Sammy
- Martin, Shawlene
- Mataya, Karen
- Mateyvskaia, Vera
- Mayn, Alex
- McAlister, Diana
- McClellan, Perry
- McCowen, Adam
- McCowen, Shannon
- McDonald, Margaret
- Mcgrath, Jeff
- McGregor, Alex
- McGregor, Linda
- McKee, David
- McKee, Janet
- McKenna, Theresa
- McLagan, Carol
- McMillan, Riley
- McWalter, David
- McWilliams, Susan
- Meek, Patricia
- Melchor, Maribel
- Melendez, Hernandez
- Melovatska, Luomvla
- Melovatska, Vlodimir
- Mendoza, G
- Merkle, Volus
- Meronte, Anthony
- Meus, Mason
- Mikhaylov, Igor
- Mikhaylov, Svetlana
- Milano, Sheila
- Milikchur, Dina
- Miller Skinner, Beverly
- Miller, Dving
- Miller, Norman
- Miller, Rosalyn
- Miller, Russ
- Mills, Tracy
- Milton, Erik
- Minier, David
- Minier, Hayley

- Mir, Vladi
- Mitin, Aleksy
- Mitin, Peter
- Mitina, Lada
- Mnushko, Oleksandr
- Mnushko, Sergiy
- Modrell, Denise
- Moire, Shelley
- Mokhnach, Mark
- Mokhnach, Nina
- Molchanets, Roman
- Molchanets, Sergiy
- Molitor, Emily
- Monasmith, Candace
- Montenguise, Lisa
- Montgomery, Teresa
- Moody, John Robert
- Moore, Amanada
- Moore, Jesse
- Moore, Kurt
- Moore, Lynn
- Moore, Tonya
- Morales, Reina
- Mordavets, Andrii
- Mordavets, Angeline
- Moreno, Erick
- Moriyasu, Saya
- Morkhun, Luda
- Morrisey, Shae
- Morton, Sarah
- Moshniakov, Ganna
- Moshniakova, Yulia
- Moskalets, Alex
- Moskalets, Raisa
- Moss, Michael
- Mulik, Aleksandr
- Mulik, Diana
- Mulik, Inna
- Mulik, Max
- Mulik, Victor
- Mulik, Vladimir
- Murphy, Taylor
- Murziuk, Irene
- Musnitskiy, Petr
- Musnitsraya, Klavidiya
- Mussalman, Karen
- N
- N, Anna
- N, N
- N, Timothy
- Nakonechna, Tetiana
- Nakonechny, Jenni
- Nakonechnyy, A
- Nakonechnyy, Maria
- Nakoredmy, Viktoriya
- Nastyuk, Valeriy
- Nastyuk, Yelena
- Nataliya, Y
- Naum, Serg
- Negrov, Sergey
- Negrov, Vera
- nesse, kristine
- Newman, Josee
- Newton, Emily
- Nick
- Nielsen, Jennifer
- Nielsen, Marget
- Niholin, Ed
- Nikiforets, Mariya
- Nikiforets, Vasiliy
- Nikitina, Olga
- Nikolaychuk, Andtol
- Nikolayer, Andrey
- Nilson, Claudia
- Noah, Debra
- Novak, Josh
- Novikov, Paulo
- Nutt, Don
- Nyez, Duane
- O, A
- O, Mary
- O'Dell, Carol
- O'Leary, Anna
- OLeary, Bobbie
- Olex
- Olidinchuk, Elena

- Olidinchuk, Emiry
- Oliinyk, L
- Oliinyk, Natalia
- Olson, Brooky
- Olson, Caley
- O'Neill, Paula
- Onyshchuk, Iryna
- Onyshchuk, Roman
- Oryshchenko, Nataliya
- Osor, Erkhem
- Ostrovska, Yulia
- Ostrovskyi, S
- Owens, Michael
- Owens, Timothy
- P, Galina
- P, Inh
- P, Maria
- P, S
- P, Sergiv
- P, T
- P, V
- P, Victor
- Page, Karen
- Palmer, Elizabeth
- Palmer, Nancy
- Park, Byong
- Park, Jenny
- Parker, Greg
- Parker, Jill
- Parker, Natalia
- Parker, Nellie
- Pashkovsty, Julia
- Pashnovsky, Yelena
- Pate, Mary
- Pattison, Candice
- Paul, Judith
- Paulson, Patrick
- Paulus, Marilyn
- Pavel, Daniel
- Pavel, Jessica
- Pavlenko, Andrey
- Pavlenko, Andrey
- Pavlovich, Anna
- Pavlukov, Deanna
- Paxlyshyn, V
- Peba, Marjorie
- Penrod, Sigrid
- Perdykh, Olene
- Peregrino, Karla
- Perekopsky, Pavel
- Perkins, Rebecca
- Perry, Theresa
- Peters, Jeanne
- Peters, Jeanne S
- Petro, Didur
- Petrus, Adrian
- Piatnitsky, Esther
- Picken, Gayle
- Pierens, Galina
- Pik, Gennadur
- Pik, Lidiya
- Pikhulya, Sergiy
- Pilat, Anatoly
- Pilat, Oksana
- Piontkevich, Vitaliy
- Piontkevich, Liliya
- Piontkevich, Vithliy
- Piven, Tatyana
- Plironov, Nataliya
- Plukchi, Andre
- Poe, Sheila
- Poff, Dixon
- Poggi, Kim
- Pogosova, Era
- Poksam, Natalya
- Polupan, Larisa
- Polyani, Nataliya
- Polyansky, Elija
- Polyansky, Mila
- Ponkratov, Liliya
- Poole, Leslie
- Popkov, Sergey
- Popkova, Larisa
- Poposyan, Tigran
- Popravko, Iiyana
- Poprova, Dine

- Prescott, Susan
- Pride, Sherri
- Prisakar, Nina
- Prokhor, Lyerdmila
- Prokhor, Viktor
- Proudfoot, Pat
- Puglisi, Philip
- Pyzhivskyx, Lyudmila
- Qi, Yukuan
- Quigley, Chaundra
- Quinn, Ann
- Quintero, Ismael
- Quintero, Shauna
- R, Anna
- R, Josh
- R, Olena
- R, Renea
- R, S
- Radchuk, Serbii
- Rains, Karl
- Ramsell, Donna
- Rang, Cynthia
- Raskin, Vldimir
- Rasyaneyky, Fedir
- Raugust, Cathie
- Ray Morton, Sara
- ray, cindy
- Raydalov, Andriy
- Rearden, Patsy
- Reddick, Helen
- Rees, Ryan
- Reeves, Mirella
- Repiya, Valentina
- Rex
- Rhoadarmer, Mildred
- Richards, Judy
- Richmond, Katherine
- Rickard, Mariana
- Roberts, Chris
- Roberts, Ctad
- Roberts, Dejch
- Roberts, Jessica
- Rocio
- Rodriguez, Anel
- Rogeness, Lorene
- Rogers, Rex
- Rogers, Ruezlon
- Romanenko, Tetiane
- Romanenko, Valentin
- Romaneva, Zara
- Rome, Ramona
- Rose, Noreen
- Roseburg, Valentina
- Ross, Cameron
- Ross, Harold
- Royal, Sanna
- Rudd, Kristi
- Rudner, Sergey
- Rudneva, Tatiana
- Rudnitsky, Uasily
- Rupakno, R
- Russell, April
- Russu, Olga
- Rutkovskiy, I
- Rutty, Robin
- Ryan, Jennifer
- Rybok, Dmytro
- S
- S
- S, A
- S, Alina
- S, Debbie
- S, Gennadiy
- S, Jaira
- S, Jamie
- S, L
- S, Lee
- S, Mykhoila
- S, Nadezhda
- S, P
- S, S
- S, Y
- Sabrina
- Sadiki, Alla
- Sadovy, Vlad
- Salazar, Carolina

- Salmons, Dianne
- Samolouov, H
- Sand, Shanae
- Sanders, Diane
- Sandoval, Brayán
- Sapelnikov, V
- Sarackman, Inna
- Sarajzhri, Zantín
- Sarthard, Brandy
- Sauber, Wendy
- Saum, Renee
- Savage, Tessa
- Savchik, L
- Savin, Mikhail
- Schempp, Sylvia
- Schlichtina, Betty
- Schmidt, Bernard
- Schrag, Rosalyn
- Schroeder, Beverly
- Schroer, Abraham
- Schroer, Gulnara
- Schroer, William
- Sebok, Freida
- Sees, Verutte
- Seese, Norma
- Seibel, Tia
- Seil, Wilma
- Semenko, Fedor
- Semenko, Nelli
- Sen, Mv&sdchen
- Senchenko, Yuriy
- Senchuk, Irina
- Senchuk, Stan
- Senckun, Nadezhado
- Sereda, Inna
- Sergey
- Sergneri, Gilda
- Serpanos, Inna
- Serrano, M
- Sexton, Sheila
- Shablevsky, Gabriela
- Shafer, David
- Shamray, Liya
- Shaney, Mlissa
- Shcherbatova, Inna
- Shchergatov, Yeher
- Shepard, Ellie
- Shershen, Alona
- Sheryko, Nataliye
- Sheulishov, Ivan
- Shevchuk, Natalya
- Shkarin, Dennis
- Shpak, Pavel
- Shuets, Inna
- Shutz, V
- Siebert, Josephine
- Silva, Marcio
- Simonyan, Lolita
- Sivachev, Ruth
- Sivachev, Rutie
- Sivachev, Yelena
- Skobyak, Liubov
- Slaughter, Tammy
- Sletner, Jettrell
- Slipper, Fred
- Slipper, Suzette
- Slisenko, Julia
- Smallman, Tammy
- Smith, Chelsea
- Smith, Donna
- Smith, Heidi
- Smith, Melissa
- Smithgall, Molly
- Smythe, Alice
- Snezhvo, N
- Sneznko, Y
- Sollmen, Ryann
- Solomon, Evan
- Sorienko, Mariia
- Sorienko, Volodymyr
- Soshenko, Anatolii
- Soshenko, Larysa
- Southwick, Nancy
- Sowr, Ruth
- Spencer, Judy
- Spiess, Maria

- Stakhovich, Galina
- Stakhovich, Sergey
- Stanovich, Dianne
- Stasyuk, Yakov
- Stelsiuk, Pavlo
- Stendera, John
- stensgar, John
- Stepanak, Natalia
- STERLING, ALICE
- Stevens, Ashten
- Stokle, Marci
- Stollov, Kristin
- Stowe, Kathy
- Stowe, Mike
- Stowe, Mikiya
- Strong, Sabrina
- Stupika, Galina
- Stupnytska, Iryna
- Suarez, Salvador
- Submission, Anonymous
- Submission, Anonymous
- Suk, Mariya
- Sule, Helen
- Sutton, Marsha
- Svetlana, Lukeshova
- Svetlana, Pavliy
- Sviridovich, Alex
- Swanson, Melissa
- Swartz, Lesa
- Swartz, R
- Symonchuk, David
- Symonchuk, L
- Symonchuk, Vasyl
- Synyuk, Olga
- Synyuk, Petro
- Syrykh, Evelyn
- Syrykh, Jasmine
- Syrykh, Kakili
- T, C
- T, H
- T, Kathleen
- T, R
- T, S
- Tabakar, Olekfandra
- Talbot, Addie
- Talbot, Kara
- Tarikian, Azad
- Tatarchuk, Tatiana
- Tatiana, Runova
- Tatum, Ethan
- Taylor, Leslie
- Tenefrancia, Melissa
- Tenone, Anne Marie
- Teotonio, Frederique
- Terekhin, Nadczhola
- Terekhin, Nikolay
- Terekhina, Liubov
- Tesleuko, Tetyana
- Teter, Patricia
- Tetiana
- Thomas, Joanne
- Thompson, Amy
- Thoneton, Carole
- Thoren, Pat
- Thorp Rowin, Shari
- Tillum, Morgan
- Tischenko, Nikita
- Tischenko, Pavel
- Tischenko, Sasha
- Tischenko, Victoria
- Titeu, Pavel
- Titov, Anna
- Tkach, Anna
- Tkachov, Anatoliy
- Tkachova, Olena
- Tobiason, Ruthann
- Tommer, Donna
- Tonyuk, Lyuda
- Toro, Flan
- Trantham, Kathi
- Tranthan, Kathi
- Treperinas, Thelina
- Trofimovich, Erik
- Tsykaliuk, Anatolii
- Tsymbalyuk, Dimytro
- Tsymbalyuk, Mykola

- Tsymbalyuk, Roman
- Tumur, Tunga
- Turcan, Alex
- Turcan, Gabe
- Turcan, Nicolina
- Underwood-H, Leslie
- Uribo, Bob
- Usach, N
- V
- V, A
- V, B
- V, Christine
- V, V
- V, Yevgeniy
- Vales, Frank
- Valleriia, Merrovich
- Van Dyk, Larry
- Varava, Natalia
- Vasylevych, Venessa
- Vechirko, Olena
- Vechtomova, Marina
- Velykoretskykh, Oleksiy
- Velykoretskykh, Vira
- Vera
- Veria
- Veselukha, Nataliya
- Veselukha, Samiel
- Veselukha, Vasyly
- Vesper, Lidiya
- Vianikov, Aleksandr
- Victor
- Vikoriya, Poirskaiya
- Viktor, Glinyk
- Viktor, S
- Vilkhovetskaya, Lyudmila
- Villalta, Brandy
- Villano, Chadra
- Vinnikova, Liliya
- Vlad
- Vlianova, Dina
- Vo, H
- Volozin, Andrey
- Volozin, Carina
- Volozin, Renata
- Volozina, Olga
- Voznily, Andrew
- Vusylenno, H
- W, Cindy
- W, Jo
- W, Kendl
- Wade, Ruth
- Wagner, Kimberly
- Wahl, Rose
- Wainwright-Feldman, Sara
- Walley, Gretchen
- Wandler, Gerald
- Wang, Andy
- Ward, Ilona
- Ward, Mike
- Warns, Ray
- Way, Gary
- Way, Joyce
- Webster, Josh
- Welch, Annabelle
- Wesson, Robert
- Whitacre, Terri
- White, Christina
- White, Kimberly
- Whitehouse, Karl
- Wieggers, Sam
- Williamson, Tammy
- Willis, Arnold
- Willis, Sharon
- Wilson, Mary
- Wilstein, Christine
- Wing, Gene
- Wisniowicz, Kimberly
- Wolf, Melissa
- Wolf, Shane
- Wolfe, Shane
- Wood, Lauren
- Woodhouse, Karen
- Woodward, Denise
- Wuensch, Deb
- Xiao, Sherry
- Y, Alex

- Y, Dmitri
- Y, Inna
- Yamasheva, Nataliya
- Yaroschuk, Inna
- Yaroshehuk, Leonid
- Yaroshenk, Volodgnigr
- Yelchan, D
- Yesemenko, Alena
- Yortskovskoya, Zina
- Yount, Tura
- Yureni
- Yuriy
- Z, Brenda
- Z, Frances
- Z, Peter
- Z, Tatyana
- Zakhariya, Leonid
- Zakhariya, Mykonis
- Zakhariya, N
- Zakhariya, Natalia
- Zakhariya, Ronan
- Zakhariya, Vira
- Zakharov, Alexander
- Zakharova, L
- Zakhrabova, Metanet
- Zapotinna, Roksolana
- Zaszob
- Zelenchuk, Anna
- Zhdanov, Igor
- Zhi Sheng, Ling
- Zhong, Tiffany
- Zhou, Lei
- Zhukova
- Zhupakenko, Vira
- Zhuravbev, Vladimir
- Zigelboym, Yakov
- Zinchenko, Aleksondr
- Zinchenko, Victoria
- Zubrad, Donna
- Zui, Juliia