



March 19, 2014

Joelle Gore, Acting Chief,
Coastal Programs Division (N/ORM3),
Office of Ocean and Coastal Resource Management
National Ocean Service, NOAA
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Silver Spring, Maryland 20910
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Re: EPA/NOAA Proposed Disapproval of Oregon's Coastal Nonpoint
Pollution Control Program under CZARA

Dear Ms. Gore:

I have been working to protect and restore our central coast watersheds for over 20 years. Most recently I have been working with the Local Stakeholder Advisory Committee and the Implementation Ready TMDL process. As you are well aware there has been little progress on the development of Best Management Practices in order to meet the requirements of the CZARA.

At this point I am taking this opportunity to support the EPA's and NOAA's proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program because I believe that Oregon does not have a program in place to deal with nonpoint source pollution in its coastal watersheds that is sufficient to carry out the CZARA management measures.

I am very concerned that the water quality standards in coastal watersheds fail to protect Oregon's native fishes including; Coho and Chinook salmon, Cutthroat, Summer and Winter Steelhead. I also believe that DEQ is not protecting our waters sufficiently to ensure our fish are free from toxic contamination, and that our rivers are not protected enough so we can swim in all of our watersheds.

From my experience there is no program in place to protect all of the beneficial uses mandated under the Clean Water Act. And I believe Oregon has failed to control run-off pollution from a number of sources such as Oregon Department of Forestry and Agriculture's pesticide use programs, riparian buffers are insufficient to protect water quality, logging of unstable slopes and Type N streams, as well as runoff from cattle operations. Also, I believe that the existing logging road network is a source of sediment, and the older septic systems create non-point pollution as well.

My participation in Oregon's Coho Salmon recovery strategies has led me to the conclusion that existing measures in ODA's Water Quality program (i.e. SB1010) are inadequate to protect water quality or improve habitat conditions



for salmon recovery. From what I see on the ground it is clear that ODF’s riparian rules are insufficient to protect water quality – I see blow-down of the small buffers and the Type N streams are cut over with no acknowledgment of the value of the headwaters of our creeks and streams. While there has been a number of individual landowners and restoration projects that have been developed and implemented to improve water quality and habitat conditions, these efforts are dwarfed by the lack of rules to protect water quality. There are no rules in place to protect ecological function and processes on industrial timber or agricultural lands.

Finally, I do not believe that Oregon has in place a program to adequately protect riparian zones that are critical to maintaining cold clean water essential to the recovery and health of our native aquatic species. Our watershed council completed a herbicide monitoring program and to our surprise there was runoff from all sources of applications – road side herbicide use, agricultural operation as well as a forestry application. So, while they may have applied it correctly there was still run-off and the rules were ineffective to truly protect water quality.

I appreciate this opportunity to comment on whether Oregon has a program in place to control nonpoint source pollution in coastal watersheds that is sufficient to achieve and maintain water quality standards and protect Oregon’s designated uses.

Sincerely,

[Redacted signature]

Attachments: photos of Coast Range landscape uses



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