



Fwd: Disapproval comments on Oregon's program under CZARA

1 message

Allison Castellan - NOAA Federal <allison.castellan@noaa.gov>
To: Allison Castellan - NOAA Federal <allison.castellan@noaa.gov>

Fri, Apr 4, 2014 at 9:12 AM

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[REDACTED]
Date: Thu, Mar 20, 2014 at 7:43 PM
Subject: Disapproval comments on Oregon's program under CZARA
To: joelle.gore@noaa.gov
[REDACTED]

to— Joelle Gore, Acting Chief,

Coastal Programs Division (N/ORM3)

Re: EPA/NOAA Proposed Disapproval of Oregon's Coastal Nonpoint Pollution Control Program under CZARA

Dear Ms. Gore,

I am writing to support EPA and NOAA's proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program. I hope disapproval turns to condemnation.

I am a farmer, timberland and mine owner and retired reforestation contractor concerned with deforestation, toxics, water quality and fisheries health for the last 45 years. In my years in coastal, Umpqua and Rouge watersheds I have witnessed enormous environmental degradation, pollution and poisoning occurring as a direct result of Oregon's Forest Practices Acts laws, the Right to Forest Laws (ORS [30.930-30.947](#)) and the Pesticide Preemption Laws (ORS 636.057). These combined laws, blatantly unconstitutional, are a license to pollute with impunity available only to the largest landscape-scale polluters in Oregon. The deforestation industries are encouraged to poison immense watersheds upstream of everybody. The laws support poisoning all native vegetation on state and private timberlands, and, because no one is liable for chemical trespass, these laws directly encourage reckless applications.

Oregon's lethal contradiction is that it overtly prioritizes chemical deforestation and monoculture above protecting Oregon's water quality standards and legally designated uses. Oregon's state and private coastal watersheds are recklessly eroded, polluted and poisoned because the state government is functionally corrupted and under the control of the deforestation and chemical industries.

What we have taking over here is Monoculture Mania—The clearcutting, burning, eroding and poisoning normal on private and state Oregon timberlands are practiced to minimize human labor through monoculture, like a Kansas field of soy or corn. These cornfield practices create great harm in Oregon's mountains, some of the most steep, rainy and windy in the world. Soil, plant and wildlife biodiversity are eliminated and washed downstream, along with all the mineral soil they held in place and the poisons used to kill them.

State-sponsored liability-free chemical applications are rationalized as labor-saving. The ultimate state land-use goal that necessitates all the clearcutting, erosion, poisoning and taking of constitutional rights is the creation of monoculture tree plantations; a horrible goal, considering monocultures have reliably caused environmental and

economic collapse throughout human history. Monoculture collapse is already occurring in Oregon watersheds, evidenced in the poverty, crime, illness and mental disease growing in rural areas. Oregon's children are already the hungriest in the nation, a direct result of the chemical deforestation elite in charge. Until this changes, we need federal protection from our own state government.

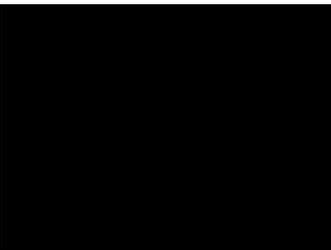
The EPA is already involved in two pertinent examples of the state's inability to protect people, water and wildlife – the Oregon Health Authority's Hwy 36 Investigation, and Curry County aerial poisonings on Oct 16, 2013.

Please incorporate all of Beyond Toxics comments on disapproval of Oregon's program under CZARA as part of my comments here. The Beyond Toxics' analysis, Oregon's Industrial Forests and Herbicide Use demonstrated the huge and growing amount of poisons routinely used to kill native vegetation, and included many applications illegal even under Oregon laws. These documented applications must be typical across western Oregon, for they occurred in an area known to be under the microscope, with numerous visits from the Oregon Department of Forestry and the EPA to address chemical trespass.

The degree to which the state's investigation was fatally compromised is indicated in the Fall 2011 newsletter of Oregonians for Food and Shelter, Salem's highest-spending lobby, serving the pesticide, fertilizer, GMO and deforestation industries. That chemical industry newsletter congratulated the lead Hwy 36 investigator for the Oregon Department of Agriculture Pesticide Division for his help in the investigation, along the governor's two lead environmental advisors. The Oregon Health Authority's only protections are to inform the residents of Hwy 36 corridor that they and their watersheds will continue to be poisoned as usual, and that Oregon's spring poisoning season has already started.

As of today, more than five months after they were poisoned, the Curry County families, their doctors and veterinarians don't know what the mix of poisons was. The state was monitoring the applications, it says, and knows the list. At first the product mix couldn't be revealed because it was a trade secret, a proprietary blend. Most recently the ODA spokesman said the chemical list wouldn't be produced until the conclusion of several investigations.

In summary, the state of Oregon's current protections of people and environment is worse than non-existent. The state is currently serving the poisoners and polluters, not the people. We need help.



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