



Fwd: CZARA Comments

1 message

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Cc: Lisa Warr - NOAA Federal <lisa.s.warr@noaa.gov>

Fri, Mar 14, 2014 at 3:12 PM

Sent from my iPhone

Begin forwarded message:



Date: March 14, 2014 at 3:08:26 PM EDT
To: <joelle.gore@noaa.gov>
Subject: CZARA Comments

Ms. Gore -

The Coastal Zone Act Reauthorization Amendments (CZARA) requires coastal states to have enforceable controls on nonpoint sources to continue to receive federal grant funds. Based on my over 30 years working as a water resources engineer and hydrologist on nonpoint source water pollution control programs and projects, EPA and NOAA have correctly concluded that Oregon has not demonstrated it:

- controls logging to protect small, medium, and non-fish bearing streams;
- protects streams from landslides caused by logging;
- protects streams from sediment eroded due to ATV use;
- controls pollution from older logging roads;
- protects streams from pesticides sprayed by logging operations;
- controls pollution from septic systems; and
- prevents pollution from new urban development.

I support the federal agencies proposal to require that the State submit a program that is approvable under CZARA. The proposed findings document describes why the State program has not yet satisfied three of the remaining conditions that relate to controlling adverse water quality impacts from forestry, new development, and onsite sewage disposal systems. It's also important that the State program be required to include agricultural management measures necessary to achieve and maintain water quality standards as provided in CZARA section 6217(b)(3), 16 U.S.C. section 1455b(b)(3).

My professional experience includes:

- Forest practices, soil disturbance, erosion and stream-sedimentation projects for US EPA, Pacific Northwest Regional Council, the City of Ashland, Oregon and the Flathead 208 Council.
- Seven nonpoint source water quality management plans for local Oregon jurisdictions, including cost/economic analyses for five.
- Nonpoint source water quality best management practices guidebook for the Oregon Department of Environmental Quality.
- Watershed, erosion-sedimentation, forest management and water quality analysis of the Ashland Municipal Watershed as a consultant to the City of Ashland, Oregon.
- Project manager of numerous water quality and flood control designs, master plans, design guidelines and cost estimates as the Stormwater Design Section Supervisor and Environmental Planning Division Manager for the Portland Bureau of Environmental Services.
- Water Quality Section Manager & Regional Planning Director for the Ada Council of Governments, Boise.
- Consultant and staff manager of numerous drinking water and water quality planning studies in Oregon, Idaho and Nevada.

- Primary author of over 100 technical reports, papers and professional articles.

Thanks for the opportunity to comment.

