

RE: Proposal to disapprove Oregon's Coastal Nonpoint Pollution Program

To whom it may concern;

I am writing to support EPA and NOAA's proposed Disapproval of Oregon's Coastal Nonpoint Pollution Control Program. I am the State Shellfish Control Authority for Oregon and manage the regulation of the commercial shellfish industry in the state.

I believe more needs to be done in Oregon to prevent pollution to our coastal environment, particularly the bays and estuaries. Oregon has a small but important shellfish industry, and one that depends on clean estuaries to function. The industry's ability to operate in the bays of the state is impacted directly by pollution. All but one of the bays in which shellfish are farmed commercially require daily monitoring because of pollution impacts of a non-point source origin. Some of these growing areas may end up being closed for over 100 days each year for pollution reasons. Such restrictive conditions severely limit the industry.

In February of this year, Coos Bay, Oregon's most productive commercial shellfish bay, was closed for over a week because of a *Campylobacter* outbreak associated with oysters. Four people were hospitalized, the implicated company was required to recall all of their product and two other large shellfish companies in the bay were also shut down as a precaution. Although the source of the outbreak may never be definitively determined, the contamination occurred in the bay itself and a human origin source is quite likely. Numerous onsite septic systems are located immediately adjacent to the growing area that was implicated in the outbreak and these must be considered a likely source of the outbreak. A more rigorously regulated and monitored onsite program may have prevented this outbreak from occurring.



Agricultural pollution is another area of concern and a closer and more
how effectively pollution from agricultural origin is being controlled is needed.

I would encourage the EPA and NOAA to stick to their proposal to disapprove the status quo in Oregon. The 'business as usual' approach is not delivering the improvements that are needed and Oregon cannot afford to be the environmental laggard of the West Coast when it comes to our coastal environment.

Sincerely,

[Redacted signature block consisting of four horizontal black bars]