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March, 16, 2014

Joelle Gore  
Acting Chief, Coastal Programs Division (N/ORM3)  
Office of Ocean and Coastal Resource Management, NOS, NOAA  
1305 East-West Highway  
Silver Spring, Maryland, 20910

RE: Comments on the Notice of Intent to Find that Oregon has Failed to Submit an Approvable Coastal Nonpoint Program (78 FR 77104)

Dear Ms. Gore:

I am writing to you on behalf of the [REDACTED]. Our council and our partners will be greatly impacted by the proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program (CNPCP) by the Environmental Protection Agency (EPA) and the National Oceanic Atmospheric Agency (NOAA). We value the CNPCP program and Clean Water Act section 319 grant monies because, together, these programs provide a large portion of funding for stream improvement, restoration projects, monitoring, and environmental education in our area.

The purpose of the CNPCP is to develop and implement management measures for nonpoint source pollution to restore and protect coastal waters, working together with state agencies and local authorities. These management measures are required to be "economically achievable measures" per 16 USCS 1455b(g)(5). To lose funding for these efforts would limit the capacity of non-profits, cities, counties, state, and federal agencies to achieve future water quality goals. Oregon is meeting and in many ways exceeding the federal statutory and regulatory requirements for Coastal Zone Act Reauthorization Amendments (CZARA) grant funding.

As a grassroots group of concerned citizens, TBWC works to address watershed management issues in the Tillamook Bay watershed, improve and enhance watershed health, and provide a framework for coordination and cooperation among key stakeholders in the watershed--including farmers, fishermen, city and county governments, and local citizens of all ages.

In 2013, our council alone completed two restoration projects that resulted in four miles of streams being opened to allow passage for coho and other salmonids. Another project completed last year restored a 3.5 acre pond dominated by Himalayan blackberry, an invasive nonnative plant species, to a sanctuary for wildlife and people with trails, a boat dock, and many new native plantings. Most

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recently, TBWC is working with Tillamook Bay Community College and Tillamook High School to carry out pre- and post-stream monitoring on Mill Creek for a culvert replacement and large wood placement and on Killam Creek for a large wood placement project. In addition, with our partners we planted over 20,000 trees and shrubs along more than 20 miles of streams in the Tillamook Bay watershed in 2013. This effort has been in place for the last ten years, and each year we are able to plant more and more miles of stream with the help of 319 grant funding.

TBWC also partnered with the Tillamook School District by sponsoring, participating in, or supporting ecological activities. These activities include implementing pre- and post-stream monitoring for a culvert replacement at Munson Creek, restoring habitat by planting native plants with 5<sup>th</sup>-grade students at Loren's Drift, leading a *Salmonwatch* field trip with 5<sup>th</sup>-grade students, conducting stream monitoring and planting native plants with East Elementary School and Tillamook High School, and coordinating the *Wilson Trask Wetland Community Education Day* where parents and children participate together in monitoring and restoration activities.

Other education opportunities where TBWC has assisted other partners in coordinating events include the *Clean Water Festival* (4<sup>th</sup>-graders), *Down by the Riverside* (3<sup>rd</sup>-graders), *Day at the Bay* (2<sup>nd</sup>-graders), and *Share the Wealth*, an evening program where parents and families work together to carry out citizen-science investigations. These annual programs have become an essential part of our local communities and were made possible with funding by the 319 grant program.

The real tragedy of the disapproval will be the loss of funding that is utilized for important work on the coast and throughout the state of Oregon to improve water quality. It is counterintuitive and contrary to the purpose of the CNPCP to remove funding for these efforts. A disapproval will reduce our ability to maintain and improve water quality in areas that need it most. The proposed action to disapprove Oregon's CNPCP punishes the restoration community and significantly limits our capacity to meet the requirements of the CNPCP and improve water quality conditions.

Thank you for considering our concerns.

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