

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

via email: joelle.gore@noaa.gov

Re: EPA/NOAA Proposed Disapproval of Oregon's Coastal Nonpoint Pollution Control Program under the Coastal Zone Act Reauthorization Amendments (CZARA)

Dear Ms. Gore:

I am writing to support EPA and NOAA's proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program. I concur that Oregon does not actually have effective programs in place to limit nonpoint source pollution in our coastal watersheds. The plans and rules they do have are not actually working programs sufficient to meet and maintain water quality standards and protect our clean water, fish and other public uses.

I also concur with EPA/NOAA that the state needs to adopt additional, enforceable management measures most importantly in agricultural and forested lands.

The areas where there need to be program improvements that would actually work to control polluted runoff from logging would be in the protection of riparian areas for small and medium streams (fish and non-fish bearing); treating old logging roads often built on fill that are leaching sediment, protection of high-risk landslide areas from cuts... these are areas we want to deliver wood if they fail, not just sediment. There also needs to be adequate buffers for protection of water quality in streams from pesticide application that may not have fish, but that convey pesticides into the larger system.

EPA/NOAA also concluded that Oregon does not have basic management measures in place to control nonpoint runoff from new development in urban areas. I concur. In Oregon there seems to be very little compliance with erosion prevention and sediment control measures. It is not uncommon to see silt fences along creeks and in development sites put up "in name only" and not actually doing anything, with the bottom edges flapping in the breeze and not buried where it could stop any sediment from reaching our waters.

I also believe that Oregon's biggest lack in management measures to help us meet water quality standards to protect our Oregon coast coho, amphibians, and drinking water and other uses may be Oregon's lack of agricultural practices. Legacy areas where there is only a buffer of blackberries along our rivers and streams do not need to be planted, cows trample our stream banks and don't need to be fenced out are common sights wherever one goes on the central coast. Beavers which could help re-build our downcutting streams channels and make complex floodplains and wetlands are trapped or hunted out. Animal waste runs off through eroding fields into our streams.

Thank you for this opportunity to comment. Oregon needs to do better to control nonpoint source pollution in coastal watersheds to protect Oregon's streams, our drinking water, our fish and wildlife and the beauty and values they should provide.

Sincerely,

A large black rectangular redaction box covering the signature area.