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Advancing the Recovery of Native, Wild Fish in Their Homewaters

March 20, 2014

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 CZARA

Dear Ms. Gore:

I am writing to support EPA and NOAA's proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program because I believe that Oregon does not have a program in place to control nonpoint source pollution in its coastal watersheds that is sufficient to carry out the CZARA management measures and the additional management measures the law requires to achieve and maintain Oregon's water quality standards and protect Oregon's designated uses. In doing so, I'm concerned Oregon is failing to protect wild, native fish.

My basis for believing that Oregon does not have a program in place to protect these uses and water quality standards is Oregon's many years of failure to control run-off pollution from timber harvest; urban development; maintenance of logging roads; pesticide use on forest land roads, highways, and bridges; insufficient riparian buffers for fish-bearing streams; insufficient riparian buffers for non-fish bearing streams; eroding streambanks and shorelines; effects of dams on water and habitat; channel modification; erosion and sediment from agricultural lands and livestock destruction of riparian areas.

My reasons for believing Oregon does not adequately control run-off pollution stems from personal observation, government and scientific reporting and a long history of failure to support clean water in Oregon due to programs that reply upon failed voluntary actions.

In addition, I do not believe that Oregon has in place a program to protect and restore riparian areas needed to maintain cool stream temperatures and habitat; protect and restore channel conditions from modification; identify where more protection is needed to safeguard important habitat for species; monitor pesticide use and impacts; assess whether pollution controls are reducing pollution and improving water quality; link the enforcement agencies and process with other agencies and use enforcement when voluntary actions are not adequate to protect water

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