



March 19, 2014

Joelle Gore
Acting Chief, Coastal Programs Division
Office of Ocean and Coastal Resource Management
National Ocean Service, NOAA
1305 East-West Highway
Silver Springs, MD 20910
Email: Joelle.gore@NOAA.gov

Dear Ms. Gore:

The proposed determination by the National Oceanic and Atmospheric Administration (NOAA) and the US Environmental Protection Agency (EPA) that the State of Oregon has failed to submit an approvable Coastal Nonpoint Pollution Control Program will negatively impact small coastal communities in Oregon that rely on NOAA and EPA funding for water quality improvement efforts.

The Columbia River Estuary Study Taskforce (CREST) is a council of local governments located at the mouth of the Columbia River. We were formed in 1974 by counties, cities, and ports on the Oregon and Washington sides of the river. The goal of CREST is to assist local governments with land use planning services and regional efforts related to water resources. CREST receives an Oregon Department of Land Conservation and Development (DLCD) Coastal Zone Management (CZM) grant each year which funds our Coastal Planner position. This grant provides base funding that is leveraged with non-federal matching funds to allow CREST to support the planning efforts of five cities, one county, and one port in the Northwest corner of Oregon. CREST assists local jurisdictions with staff reports regarding development that impacts water resources, we provide wetland delineation services, sampling analysis plans and implementation for dredging projects, and permitting assistance for local jurisdictions when they need our help with community projects. We have taken the lead on potential regional projects like a north coast upland disposal facility for dredge materials. We also implement large scale habitat restoration projects in the Columbia River Estuary that benefit juvenile salmon utilizing Bonneville Power Administration Fish and Wildlife Program funding.

The DLCD CZM funding for the CREST Coastal Planner position is essential for our work with our CREST Council members and other community stakeholders interested in water quality in the Columbia River Estuary. The decision of the federal agencies to disapprove the Oregon Coastal Non-point Source Control Program will require NOAA to withhold Coastal Zone Management funding that directly supports the implementation of the state's coastal management program. This will impact CREST and other rural coastal communities that rely on this funding for managing coastal zone resources.

CREST recognizes that preventing and reducing non-point source pollution is critical for our community and the State of Oregon, and we are committed to this effort. Developing a fully approvable Coastal Nonpoint Program is a complex and challenging task. Rather than disapproving the Oregon program, CREST requests that the federal agencies provide the State of Oregon with more time to fully satisfy all the conditions placed on the State's Coastal Nonpoint Program. This will allow the State to continue to receive and utilize essential funds designated for water quality tasks, while working towards the goal of meeting the federal agencies' requirements.

Thank you for the opportunity to provide comment regarding this important issue.

Sincerely,

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