



Fwd: CZARA comments

Joelle Gore - NOAA Federal <joelle.gore@noaa.gov>

Thu, Mar 20, 2014 at 5:58 PM

To: Allison Castellan - NOAA Federal <allison.castellan@noaa.gov>, Lisa Warr - NOAA Federal <lisa.s.warr@noaa.gov>

----- Forwarded message -----

[REDACTED]

Date: Thu, Mar 20, 2014 at 5:26 PM

Subject: CZARA comments

To: "joelle.gore@noaa.gov" <joelle.gore@noaa.gov>

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

joelle.gore@noaa.gov

I am writing on behalf of the board and members of the [REDACTED] in support of EPA and NOAA's proposed disapproval of Oregon's Coastal Nonpoint Pollution Control Program.

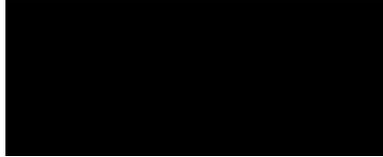
Our members engage in wildlife viewing and low impact recreation throughout the region and, further, consider conservation of habitat to be of utmost importance. One-quarter of all bird species in North America use coastal habitats for some part of their annual cycle. We are concerned that Oregon does not have a program in place to control non-point 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.

Waters are at risk from pesticides and other toxic chemicals, oil and grease, sediment, salts, excess bacteria and nutrients released from agricultural and timber lands, from roads and urban areas, from construction and mining areas, from eroding stream banks, livestock, and faulty septic systems.

Fish and wildlife are vulnerable to the adverse effects of these pollutants. Pollutants have been shown to have sub-lethal and synergistic effects that inhibit immune response, and interfere with the ability of the birds to forage and defend themselves and their young from predators. At least a quarter of all native birds are currently in decline. Of particular concern is the lack of protections from pesticides which persist in water and can bind to

soil. Pesticides may be aerially sprayed in Oregon despite a lack of understanding of the effects of pesticide drift, persistence, and run-off during rains. Compared to neighboring states, Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams. Verifiable management measures are needed to ensure that water quality is protected.

Thank you for the opportunity to provide public comment on CZARA.



--

Joelle Gore
Stewardship Division, Acting Chief
OCRM/CSC
1305 East-West Highway
SSMC4, Room 11110
Silver Spring, MD 20910
Direct: [301-563-1177](tel:301-563-1177)
Fax: [301-713-4370](tel:301-713-4370)
www.coastalmanagement.noaa.gov