



Fwd: Comments on CZARA in Oregon

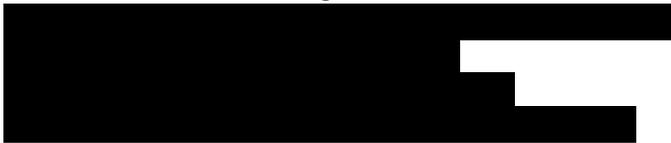
1 message

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

Thu, Mar 20, 2014 at 12:14 PM

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

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



Ms. 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

Dear Ms Joelle Gore,

Please consider these comments when reviewing your decision to deny Oregon's compliance to non-point pollution.

I strongly urge you to maintain the denial, knowing it will cause the loss of 4 million dollars in federal grants, however the total ineffectiveness of the Oregon Forest practices rules are a relic of the past and haven't one shred of intent to do better.

ODF and the governors natural resources representatives have said, the land use laws of the state take care of these non-point problems. Yet if they were effective the present conditions wouldn't be degraded. Obviously the land use laws did nothing to stop or prevent it. Business as usual is all the Department of Forestry knows and until there is a 'hammer' they will continue to do nothing. I base my opinion on over a decade of direct involvements with ODF since David Mormon of ODF and I both gave separate papers at the National Roundtable on Sustainable Forests in Washington D.C. and participated in bringing the 'sustainability indicators' to Oregon.

Currently I serve as a member of the McKenzie Watershed council and have lived on the McKenzie river going on 40 years. Being involved with many different environmental issues of 3 decades, I have followed with interest various concerns. One involved the private logging up Quartz creek off the main stem McKenzie just south of Finn Rock. Google earth that area and see for yourself the totally denuded hills and creeks. I was able to verify that there were between 400 and 500 designations of high risk areas (HRA) or High risk sites (HRS) and norther spotted owl sights that meant NOTHING to the operator. The hills, road failures and on-going erosion verify in spades the consequences of their ineffective rules and laws. The consequences don't lie.

Recently I have attempted to bring the question of how do we stop the need for restoration by shoring up our rules and regulations. It has been particularly clear how ineffectual Oregon forest practices act is when compared to Washington and California. There are signifant differences in setbacks, notification or application process and consequences for non-compliance rather than just passing the consequences on to future generations.

EPA and NOAA have concluded Oregon has **NOT** demonstrated it:

- controls logging to protect small, medium, and non-fish bearing streams;
- protects streams from landslides caused by logging;
- controls pollution from older logging roads;
- protects streams from pesticides sprayed by logging operations;

George Perkins Marsh knew over 150 years ago what happens when steep slopes are cleared of vegetation yet these bureaucrats have quite got it. They have blind eyes to the negative consequences and no understanding of management causes and management effects. They act as if future generations don't matter, only their profits.

I'll remind you of what Gifford Pinchot once said, " unless we practice conservation, those who come after us will have to pay the price of misery, degradation and failure for the progress and prosperity of our generation".

With 70% of Oregon's streams threatened or endangered because of temperature, sediment and chemicals it is past time to reign in these Oregon logging practices which do not begin to protect ecosystems or future generational needs.

I strongly urge you to maintain your denial of Oregon's ability to address non-point pollution is a comprehensive or responsible way. I just hope that the consequences will show the Department of Forestry that their laws are woefully inadequate. As those of us with our eyes wide open, know in spades.

Thank you for this opportunity to comment. I look forward to your final decision on May 15th.

Many regards,



- controls pollution from septic systems; and
- will prevent pollution from new urban development.

—
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

www.coastalmanagement.noaa.gov