

Summary of EPA/NOAA January 30, 2015 Disapproval of Oregon's Coastal Nonpoint Pollution Control Program

The EPA/NOAA disapproval made findings on four logging issues: (1) riparian buffers on small and medium fish and non-fish bearing streams; (2) legacy logging roads; (3) high-risk landslides; and (4) herbicide applications to non-fish bearing streams. (Note that so-called “non-fish-bearing” streams support fish other than salmon and steelhead, frogs, salamanders, and clean water for ecosystem health and drinking water. These streams comprise at least 70 percent of the stream network in coastal watersheds and are currently unprotected, allowing for vast areas of clear-cutting.) Some of the findings include:

Protection of Riparian Areas

- Oregon has no riparian protection for small non-fish-bearing streams.
- A significant body of science—including three Oregon studies—demonstrates that Oregon's riparian protection for small and medium fish-bearing and non-fish-bearing streams is inadequate to meet water quality standards for temperature.
- Non-fish-bearing streams should be treated the same as fish-bearing streams for the purpose of establishing the size of riparian buffers.
- Substantial adverse effects are associated with riparian buffers of 65-98 feet, with minimal adverse effects associated with buffers of 150 feet.

Impact of Forestry Roads

- So-called legacy roads (built before 1971) are located and built in ways that have on-going ecological consequences, primarily in supplying sediment to streams and triggering landslides.
- Oregon has no inventory of legacy roads, no requirement to ensure such roads have no water quality impact, nor a monitoring system to track voluntary efforts to fix them.

Protection of Landslide-Prone Areas

- Studies show significant increases in landslides and their severity after clear-cuts.
- Riparian buffers on unstable slopes would reduce landslide density and sediment volume.
- Oregon has failed to identify high-risk landslide areas, to adopt restrictions on logging and logging roads to reduce landslides, and to monitor the impacts of landslides after they occur.

Ensure Adequate Stream Buffers for Application of Herbicides, Particularly on Non-fish-bearing (Type N) Streams

- Oregon has no spray buffers for aerial application of herbicides on small non-fish-bearing streams.
- Herbicides reduce growth in the aquatic food chain that supports fish and wildlife at levels well below those levels believed to affect human health.