

RESPONSE TO COMMENTS

Clark, Cowlitz, SW Lewis Geographic Response Plan

Comments Received through June 18, 2015

We appreciate the time and effort all contributors provided in developing and submitting their comments on the draft version of the Clark, Cowlitz, SW Lewis Geographic Response Plan. Comments received were categorized and may have been condensed to make them fit the format of this document. Complete copies of the original comments as submitted to Ecology can be found at the end of this document.

For each comment, the contributor is acknowledged by the number preceding their name in the list below. Comments were contributed by the following individuals:

- (1) Shayne Cothorn, WA-DNR
- (2) Jill Kangas, Lewis County DEM
- (3) Brian MacDonald, WDFW
- (4) William McPherson
- (5) Fred Norman
- (6) John Wheeler, CRESA
- (7) Jeff Wilson

General Comments:

Comment: There is a significant portion of rail that borders or crosses the various waterbodies within this GRP. There are also pipeline crossings that pose significant risk. The GRP should provide an illustration and/or call out these areas as well as provide more specifics on amounts of crude traversing these areas and risk posed. As oil transportation through this region increases so should our level of awareness and preparedness. We must ensure all that can be done is done to identify and mitigate risks along this rail line as use for crude by rail (CBR) transport escalates. (1)

Response: The risk assessment in Chapter 2 is an overview of oil spill risks in the area rather than a list of all causal factors that might lead to a spill, such as a train derailment, terrorism event, or earthquake. Rail and pipeline spill risks are properly mentioned given the purpose of the plan. GRPs are a part of the larger Northwest Area Contingency Plan which also contains information on oil spill risks, as do plans from industry and Local Emergency Planning Committees.

Comment: What measures exist and/or will be implemented to assess, repair, and maintain rail to a condition suitable to CBR transport-especially along routes that borders and/or might impact the waterbodies contained within this GRP? (1)

Response: The determination of measures to assess, repair, and maintain rail systems in Washington State falls outside the scope of this plan update.

Comment: What type of risk assessment work will be conducted to analyze geologic hazards to rail lines- especially sections close enough that a derailment would significantly impact state waters? (1)

Response: The work to assess and analyze geologic hazards along rail lines in Washington State falls outside the scope of this plan update.

Comment: Why does the title of the plan not include “Southwestern Lewis County”? Absent any reference to our area, we would not know to look in the Clark-Cowlitz plan for coverage in Lewis County, nor do we think anyone else would! (2)

Response: Based on your comment, the name of the plan has been changed to the Clark, Cowlitz, and SW Lewis Geographic Response Plan.

Comment: When that GRP will be available for review? (2)

Response: The final plan has been published and is available online at http://www.ecy.wa.gov/programs/spills/preparedness/GRP/cowlitz_clark/Clark-Cowlitz.htm.

Comment: It is imperative to strengthen the plan to include inspections of crossings and other hazardous areas where collisions can cause major oil spills. (4)

Response: The inspection of rail crossings and other locations where collisions could occur falls outside the scope of this plan update.

Comment: Seems like you are barking up the wrong tree. The railroad record on spills is better than most other methods of transportation. Why further regulate. The railroads already have a response plan and teams. The goal according to the chronicle (Chehalis/Centralia, Wash on May 26, 2015 is to reduce the hazard to "nature, economic, and cultural resources." Did you forget about people? Maybe cultural

resources are more important? A few more trains a day just means jobs for the Northwest United States. Well only a month to plan so better plan for more regulations! (5)

Response: This plan is not a regulation but rather a tool to be used when oil is spilled to water. The Clark, Cowlitz, SW Lewis GRP is just one plan of a hierarchy of plans that would be used during an oil spill to protect the public, responders, and the environment. GRPs focus on protection of sensitive resources, a lower priority than efforts to contain and control a spill at or near its source. Other plans would prescribe actions and objectives specific to the spill itself. After an incident occurs, public safety and the safety of first responders are paramount, regardless of the spill source (roadway/highway, rail, oil pipelines, or other risks).

Spill Response Contact Sheet:

Comment: Incomplete information on Page ii under Washington State Dept of Fish and Wildlife; add “Oil Spill Team (360) 534-8233*.” (3)

Response: Based on your comment, WDFW Oil Spill Team information has been added to the Contact Sheet.

Comment: Throughout the document, CRESA’s front desk, administrative line, 737-1911, is listed. This is a non-emergency line, staffed by clerical personnel from 8-5, Mo-Fri. This is only appropriate for non-emergency administrative contact of CRESA and is not the best way to access emergency assistance. If the intent is for responders to access emergency assistance and other emergency contacts for Clark County public safety and supporting agencies we recommend calling 911, if the responder is calling from within Clark County. If they are calling from outside Clark County, they should call (360) 696-4461 for emergency support. Call (360) 693-3311 for non-emergency assistance. Both of these numbers are answered by dispatchers. (6)

Response: Based on your comment the contact number for CRESA has been updated throughout the document.

Comment: Under “Tribal Contacts” Yakima Nation is misspelled. It should be “Yakama Nation.” (6)

Response: The typographical error for “Yakama Nation” has been corrected on the contact sheet.

Comment: Under "Local Government" update CRESA's emergency contact number; should be 911 or (360) 696-4461. If the intent is to also include administrative numbers (8-5) for public safety agencies, also include: Vancouver Police Department, Clark County Fire & Rescue (Woodland, Ridgefield, Battle Ground, La Center), and Clark County Fire District. No. 6 (Hazel Dell, Salmon Creek, Felida). CRESA's Emergency Management Duty Officer may be included in this listing. They can be contacted 24/7/365 via CRESA dispatch OR directly by calling (360) 562-0130. Note that CRESA Emergency Management can coordinate any support that may be needed from Clark County, its seven cities, and partner agencies, especially for any assistance not available through dispatch/911. This may be a better option than having responders having to hunt around for the contacts and assistance. (6)

Response: Based on your comment, emergency and non-emergency contact numbers for CRESA, and the number for CRESA's Duty Officer, have been added to the contact sheet. Contact numbers for emergency services (police/fire) for cities in Clark County have been removed from the list since contact would be coordinated through CRESA. Generally, contact numbers on the sheet are not provided for administrative offices unless no other contact numbers are available for the agencies, organizations, or groups listed on the sheet.

Comment: NOAA Weather contact number is for the Seattle NWS; This GRP area is covered by the Portland NWS. (6)

Response: The contact sheet now provides the contact number for NWS Portland. Reference to NWS Seattle has been removed.

Table of Contents:

Comment: Typo on the Table of Contents, Chapter 4 – "Rspnse" should be "Response." (2)

Response: The typographical error in the Table of Contents has been corrected.

Chapter 2 – Site Description:

Comment: The Port of Vancouver is a major port with docks and facilities that store and transport oil and chemicals; Tidewater Barge is also an oil shipper. Are these worth listing separately in Section 2.6 (Risk Assessment)? (6)

Response: The Port of Vancouver falls within the planning area for the Lower Columbia River GRP and is mentioned in Section 2.6 of that plan. The Lower Columbia River GRP borders this plan to the south and southwest between Vancouver and Longview.

Chapter 4 – Response Strategies and Priorities:

Comment: The GRP lists individual phone numbers for police and fire agencies. Here again, if the intent is to request emergency assistance, the best thing to do is to call 911. (If you reach them at their agency numbers, the responding personnel will have to check-in and assign through dispatch anyway. So this adds un-necessary steps.) The GRP should be updated throughout the document to reflect this. (6)

Response: The contact number for CRESA has been added. Contact numbers for emergency services (police/fire) for cities in Clark County have been removed since contact with those agencies would be coordinated through CRESA. The number for Washington State Patrol (WSP) remains listed since they are part of state government.

Comment: Incorrect Information: Page 4-95 and page; Under "SA-KLMAR-0.7" edit "Contact" to read: "WDFW Region 5, 2108 Grand Boulevard, Vancouver, Washington 98661 (360) 696-6211 or email TeamVancouver@dfw.wa.gov." (3)

Response: Based on your comment, the contact information for staging area SA-MAR-0.7 has been updated in the matrices of Chapter 4 and in Appendix 4C.

Comment: Response strategy "BRBRC-11.6" and staging area "SA-LEWR-14.7" in the draft plan provide contact information for CRESA's administrative offices. Responders should call (360) 696-4461 for emergency support or (360) 693-3111 for non-emergency assistance. (6)

Response: Contact information for CRESA has been updated for response strategy BRBRC-11.6 and staging area SA-LEWR-14.7, as appropriate.

Comment: On Page 113 of the draft plan I assume notification strategy for CWLZR-5.2-N should say 'Notify City of Longview' rather than the "City of Vancouver." (6)

Response: Notification strategy CWLZR-5.2-N has been updated to reflect that the "City of Longview" should be contacted rather than the "City of Vancouver."

Comment: My biggest concern is that there simply is not near enough supplies and equipment needed at the staging areas. There seems to not be enough or new areas defined to stage equipment for rapid response. Each staging area needs to be treated like a fire station more ready to go than not. I feel this part of the plan is inadequate and does not meet the threshold for providing an effective first response. Require more equipment to meet the recovery needs. (7)

Response: Unfortunately this issue is outside of the scope of the GRP. Information about the storage location of response equipment can be found on the Western Response Resource List (WRRL), available online at www.wrri.us.

Chapter 6 – Resources at Risk:

Comment: On page 6-1, insert the following text immediately below section title: "Most biological communities are susceptible to the effects of oil spills. Plant communities on land, eelgrass and marsh grasses in estuaries, and kelp beds in the ocean; microscopic plants and animals; and larger animals, such as fish, amphibians and reptiles, birds, mammals, and a wide variety of invertebrates, are all at potentially at risk from smothering, acute toxicity, and/or the chronic long-term effects that may result from being exposed to spilled oil." (3)

Response: Based on your comment, information has been added to Section 6.2 of the plan.

Comment: Remove the extra space before "Chinook [FT/SC]" on page 6-3, under Fish/Shellfish (2nd bullet). Also remove the extra space before "Pacific eulachon smelt [FT/SC]" on the same page (7th bullet). Remove the extra space before "Oregon spotted frog [FT/SE]" under "Amphibian/Reptile" (2nd bullet). (3)

Response: The typographical errors on page 6-3, as noted, have been corrected.

Comment: On page 6-4 under "Plants," remove the extra space before "Bradshaw's desert parsley [FE]" and eliminate the hyphen between "desert" and "parsley." Remove the extra space before "Golden paintbrush [FT]." (3)

Response: The typographical errors on page 6-4 of the draft plan, as noted, have been corrected. Information on sensitive plant species now resides on page 6-3 of the updated final plan.

Comment: Incomplete information on page 182. WDFW recommends adding new section (6.5.4) titled "Pre-cleaning of shorelines." In the new section, insert the following text: "Pre-cleaning" refers to the removal of loose material (typically organic) from a shoreline before it is affected by an oil spill. Before starting any beach pre-cleaning, the Operations Section should provide the Environmental Unit Leader (Planning Section) with a list of shorelines (with location descriptions) being considered for pre-cleaning. The Environmental Unit will consult with the Wildlife Branch and the Natural Resource Damage Assessment (NRDA) group to determine whether the proposed pre-cleaning will conflict with other resource protection or NRDA goals or activities. Environmental Unit staff will report back to the Operations Section with an evaluation of the proposed beach pre-cleaning." (3)

Response: Information about the pre-cleaning of shorelines, pre-oiling debris removal, or pre-spill debris collection is an advanced tactic that would be considered by the Environmental Unit after a Unified Command is formed. A decision about the appropriateness of pre-cleaning shorelines falls outside the scope of this plan and, therefore, is not included.

Comment: On page 6-4 under "Side channels and impounded areas," edit the sentence to read "and provide feeding and resting areas for a variety of birds, including waterfowl and herons." (3)

Response: Based on your comment, information has been added to the description of "side channels and impounded areas" on page 6-4 of the updated final plan.

Comment: On page 6-4 under "anadromous salmonids" (1st bullet), strike "Rainbow" from this sentence. (3)

Response: Reference to "trout" instead of "rainbow trout" on page 6-4 under the bullet titled "anadromous salmonids" will be made during a future update to the plan.

Comment: Add a space between "RM" and "7" on Page 6-5 of the draft plan under "Cowlitz River" (1st bullet, 1st sentence). (3)

Response: Based on your comment, a space has been added between "RM" and "7" under "Cowlitz River" (1st bullet, 1st sentence).

Comment: The text box containing "Cowlitz County, WA" in Figure 6-1 on page 6-8 is constricted and has text that's partially obstructed. Expand the text box until the text is readable. (3)

Response: Figure 6-1 has been updated. The label for "Cowlitz County, WA" is now legible.

Comment: Add an "and" between "ducks" and "geese" in item 7 on page 6-9 (1st sentence). Also add an "and" between "ducks" and "geese" in item 8 on the same page. (3)

Response: As noted, reference to "ducks, and geese" has been provided in item 7 and item 8 of the final updated plan on page 6-8.

Comment: Possible incorrect information on page 6-14 of the draft plan. WDFW was not able to confirm the basis for the first two sentences relative to take associated with marine mammals. Recommend deleting the first and second sentences of this paragraph. In addition, with regard to the 3rd sentence, recommend striking the words "...and recommend..." As written it could be inferred that hazing operations will be conducted by default – which may not be the case. (3)

Response: Based on your comment, changes have been made to Section 6.5.2 (Hazing).

Comment: In Section 6.5.3 (oiled wildlife), insert the words "of oiled wildlife" after the word "observations." (3)

Response: Inclusion of the words "of oiled wildlife" to follow the word "observations" in Section 6.5.3 will be provided in a future update to the plan.



June 15, 2015

Washington Department of Ecology
Spill Prevention, Preparedness, and Response (GRPs)
P.O. Box 47600
Olympia, WA 98504-7600

SUBJECT: CLARK-COWLITZ GRP

To Whom It May Concern:

Please accept these comments from the Washington State Department of Natural Resources (DNR) regarding the Clark-Cowlitz Geographic Response Plan.

DNR is the manager of over 3 million acres of state trust lands comprised of forest, range, commercial, and agricultural lands, and 2.6 million acres of state-owned aquatic lands. The Clark, Cowlitz, Lewis, Kalama, and Toutle Rivers are contained within the state of Washington with lower portions declared navigable at the time of statehood. These sections declared navigable are state owned aquatic lands (SOAL) managed by the Department of Natural Resources for the citizens of the state. If any questions on ownership please call and I would be glad to provide specifics.

Oil spills represent a significant threat to the health of SOAL within this GRP. DNR would like to commend the Department of Ecology for updating the GRP for these valued waterbodies and appreciate the opportunity to comment.

Prevention is the most productive effort to ensure oil spills do not harm aquatic resources and the citizens and economy of Washington that depends on these resources. We have a legislative mandate to seek methods to achieve a zero spills status in this state; although we have one of the most comprehensive spills programs in the nation we have yet to attain this goal.

There is an unpredictable nature to spills and we must do all we can to ensure maximum recovery when all preventative measures have failed. Geographical Response Plans (GRPs) are an excellent strategy to ensure that a response can begin immediately and with some productivity until a proper oil spill trajectory can be constructed and response strategy developed. Time is of the essence when trying to ensure maximum recovery can be achieved. With this said we must acknowledge that on average maximum recovery is 20% or less for most major oil spills and

often less in riverine systems. It is DNR's hope that effective preparedness measures such as GRPs will improve recovery numbers for spills in Washington State.

GRPs cannot be considered complete until all hazards are properly identified. Where these hazards have not or cannot be mitigated for GRPs must be developed to be prepared to respond effectively and efficiently. In a riverine system this means time is of the essence and adequate equipment and personnel must be staged accordingly. As risk increases so should the level of preparedness.

There is a significant portion of rail that borders or crosses the various waterbodies within this GRP. There are also pipeline crossings that pose significant risk. The GRP should provide an illustration and/or call out these areas as well as provide more specifics on amounts of crude traversing these areas and risk posed. As oil transportation through this region increases so should our level of awareness and preparedness. We must ensure all that can be done is done to identify and mitigate risks along this rail line as use for crude by rail (CBR) transport escalates.

There currently exists a large gap in contingency planning by State. Oil handling facilities are held to a high planning standard yet rail lines hauling crude oil are not yet held to these same standards. Legislative mandates to conduct rulemaking regarding CBR transport contingency planning are currently being finalized via SHB-1449. It is DNR's hope that this rulemaking results in proper oversight of CBR hazard mitigation. Until these planning efforts are complete, and necessary mitigation efforts taken, DNR must express strong concern regarding current state of preparedness and gap in GRP planning. We encourage Ecology to move forward as quickly as possible to fill this gap by completing any and all necessary rulemaking and planning efforts to fill these gaps.

We ask Ecology to consider and address the following questions in its rulemaking/planning efforts to mitigate risk and enhance GRP development:

- 1) What measures exist and/or will be implemented to assess, repair, and maintain rail to a condition suitable to CBR transport-especially along routes that borders and/or might impact the waterbodies contained within this GRP?
- 2) What type of risk assessment work will be conducted to analyze geologic hazards to rail lines-especially sections close enough that a derailment would significantly impact state waters?

DNR recommends the following risk assessment work to analyze geologic hazards at rail yards, pipeline crossings, and along rail lines that will carry crude oil that border and/or cross the waterbodies contained within this GRP:

- 1) Identify both shallow and deep-seated landslide hazards using DNR's GIS Statewide Landslide database and then create a site-specific geologic map. In areas with no existing landslide inventory, create a shallow landslide database using historic aerial imagery and other spatial data in a GIS;
- 2) Evaluate riverbank sloughing and subaqueous landslide hazards using bathymetry or similar

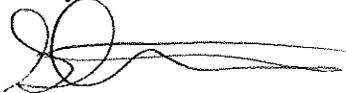
DEM data;

- 3) Identify potentially unstable slopes using a lidar-based slope hazard assessment tool comparable to the Oregon Department of Geology and Mineral Industries protocol (Burns, W. J., and Madin, I. P., 2009, Landslide protocol for inventory mapping of landslide deposits from light detection and ranging (lidar) imagery: Oregon Department of Geology and Mineral Industries Special Paper 42, 30 p., geodatabase template) in a GIS. Acquire lidar as needed;
- 4) Identify slope hazards associated with slope modification or vegetation removal at construction areas-especially in areas where rail expansion and/or repair may be needed to handle increased CBR transport;
- 5) Evaluate earthquake hazards including earthquake-induced liquefaction and other earthquake-induced ground failures; and

The above mentioned assessments are critical to completing an adequate GRP. Sufficient equipment and personnel must be staged along railways to ensure GRP implementation is immediate and effective as can be possible should an incident occur, again acknowledging that PREVENTION through proper maintenance and design is where dollars are best spent. The level of equipment and personnel along rail and pipelines should increase comparable to increased risk posed by volumes moving along and/or across these waterbodies.

Should you have any questions regarding these comments, please do not hesitate to contact me at (360) 902-1064. If you have questions specific to geologic hazard risk assessment please contact our State Chief Hazards Geologist, Tim Walsh, at (360) 902-1432.

Sincerely,



Shayne Cothorn
Spill Response Coordinator
Department of Natural Resources

CC: Kristin Swenddal, Aquatics Division Manager
Dave Norman, Geology Division Manager
Matt Niles, Assistant Division Manager, Rivers District

From: Jill Kangas [mailto:Jill.Kangas@lewiscountywa.gov]
Sent: Thursday, May 28, 2015 12:03 PM
To: ECY RE Geographic Response Plans
Cc: Steve Mansfield
Subject: Clark-Cowlitz Geographic Response Plan Comments

We have received the draft **Clark-Cowlitz** Geographic Response Plan and have one major concern: **Why does the title not include “Southwestern Lewis County”?** Absent any reference to our area, we would not know to look in the Clark-Cowlitz plan for coverage in Lewis County, nor do we think anyone else would!

Have participated and helped coordinate several of the meetings for western Lewis County, we are wondering **when that GRP will be available for review?**

Also, it's minor, but we noticed a typo on the **Table of Contents, Chapter 4 – “Rspnse”** should be “Response”.

Thanks for the opportunity to review the Plan and we look forward to hearing back regarding our concerns.

Jill Kangas, Planner
Lewis County DEM
351 NW North Street
Chehalis, WA 98532
(360) 740-1153
FAX: (360) 740-1471
Jill.Kangas@lewiscountywa.gov
Website: www.lewiscountywa.gov

From: Macdonald, Brian F (DFW)
Sent: Friday, June 05, 2015 2:50 PM
To: ECY RE Geographic Response Plans
Subject: Clark, Cowlitz, SW Lewis GRP Review comments

To whom it may concern.

The WDFW Oil Spill Team has reviewed the draft Clark, Cowlitz, and SW Lewis GRP and our comments and suggestions may be found in the attached document.

Please contact me directly if you have any questions concerning any of these comments.

Thank you for your consideration.

Regards,

Brian MacDonald, Oil Spill Planning and Response Specialist
WA Dept. Fish & Wildlife, Habitat Program, Protection Division
Phone: (360) 902-8122, Email: brian.macdonald@dfw.wa.gov
Mail: 600 Capital Way N; Olympia, WA 98501, MailStop: 43143

Clark, Cowlitz, SW Lewis GRP review				
WDFW - Brian MacDonald 6/5/2015				
Item	Section	Page	Issue	Recommendation
1	Contact Sheet	ii	Incomplete information	Under "Washington State"/"Dept of Fish and Wildlife" add "Oil Spill Team (360) 534-8233*".
2	4.5.3	4-95	Incorrect Information	Under "SA-KLMAE-0.7" edit "Contact" to read: " WDFW Region 5 2108 Grand Boulevard Vancouver, Washington 98661 (360) 696-6211 or email TeamVancouver@dfw.wa.gov "
3	4C	4C-18	Incorrect Information	Under "Site Contact" edit to read: "WDFW Region 5 2108 Grand Boulevard Vancouver, Washington 98661 (360) 696-6211 or email TeamVancouver@dfw.wa.gov "

4	6.2	6-1	Incomplete information	Insert following text immediately below section title: "Most biological communities are susceptible to the effects of oil spills. Plant communities on land, eelgrass and marsh grasses in estuaries, and kelp beds in the ocean; microscopic plants and animals; and larger animals, such as fish, amphibians and reptiles, birds, mammals, and a wide variety of invertebrates, are all at potentially at risk from smothering, acute toxicity, and/or the chronic long-term effects that may result from being exposed to spilled oil."
5	6.2	6-3	Formatting	Under "Fish/Shellfish", 2nd bullet: Remove extra space before "Chinook [FT/SC]"
6	6.2	6-3	Formatting	Under "Fish/Shellfish", 7th bullet: Remove extra space before "Pacific eulachon smelt [FT/SC]"
7	6.2	6-3	Formatting	Under "Amphibian/Reptile", 2nd bullet: Remove extra space before "Oregon spotted frog [FT/SE]"
8	6.2	6-4	Formatting	Under "Plants", 1st bullet: Remove extra space before "Bradshaw's desert parsley [FE]"
9	6.2	6-4	Formatting	Under "Plants", 1st bullet: Remove hyphen between "desert" and "parsley"
10	6.2	6-4	Formatting	Under "Plants", 2nd bullet: Remove extra space before "Golden paintbrush [FT]"
11	6.2.1a	6-4	Editing	Under bullet "Side channels and impounded areas ...". Edit sentence to read " ...and provide feeding and resting areas for a variety of birds, including waterfowl and herons...."
12	6.2.1b	6-4	Editing	1st bullet, ("Anadromous salmonids..."), strike "Rainbow" from this sentence.
13	6.2.2	6-5	Editing	Sections 6.2.2 and 6.2.3 are each titled the same. Recommend retitling 6.2.2 to read something like "GRP Region tributary descriptions".
14	6.2.2	6-5	Editing	Under "Cowlitz River", 1st bullet, 1st sentence. Add space between "RM" and "7".
15	6.2.3	6-8	Editing	Within graphic (Figure 6-1) , text box containing "Cowlitz County, WA has been constricted and is partially obstructing text. Expand text box until text is readable.

16	6.2.3	6-9	Editing	Item 7, 1st sentence. Add "and" between "ducks," and "geese".
17	6.2.3	6-9	Editing	Item 8, 1st sentence. Add "and" between "ducks," and "geese".
18	6.5.2	6-14	Possible incorrect information	Was not be able to confirm basis for the first two sentences relative to take associated with marine mammals. Recommend deleting the first and second sentences of this paragraph. In addition, with regard to the 3rd sentence, recommend striking the words "...and recommend...". As written the it could be inferred that hazing operations will be conducted by default - which may not be the case.
19	6.5.3	6-14	Incomplete information	3rd sentence. Insert "...of oiled wildlife..." after the word "...observations....".
20	6-5	6-14	Incomplete information	Recommend adding new section (6.5.4?) titled "Pre-cleaning of shorelines". In the new section, insert the following text: "Pre-cleaning" refers to the removal of loose material (typically organic) from a shoreline before it is affected by an oil spill. Before starting any beach pre-cleaning, the Operations Section should provide the Environmental Unit Leader (Planning Section) with a list of shorelines (with location descriptions) being considered for pre-cleaning. The Environmental Unit will consult with the Wildlife Branch and the Natural Resource Damage Assessment (NRDA) group to determine whether the proposed pre-cleaning will conflict with other resource protection or NRDA goals or activities. Environmental Unit staff will report back to the Operations Section with an evaluation of the proposed beach pre-cleaning."

-----Original Message-----

From: William McPherson [mailto:wrmcpherson@yahoo.com]

Sent: Friday, May 29, 2015 4:50 PM

To: ECY RE Geographic Response Plans

Subject: Oil Spill Response Plan

It is imperative to strengthen the plan to include inspections of crossings and other hazardous areas where collisions can cause major oil spills.

William McPherson
2728 Fairview Ave. E
Seattle, WA 98102
206-218-8987

5/27/15

JUN 03 2015

1/1

Spill Prevention (CG - GRP)

Seems like you are barking up the wrong tree. The railroad record on spill is better than most other methods of transportation.

Why further regulate. The railroads already have a response plan and teams.

The goal according to the Chronicle (Chelan/Centralia, Wash on May 26, 2015) is to reduce the hazard to "nature, economic, and cultural resources". Did you forget people? May be cultural resources are more important?

A few more trains a day just means jobs for the northwest U.S.

We'll only a month to plan so better plan for more regulations!

Just me.

Fred Norman

E-mail: onalaska.norman@gmail.com

From: Wheeler, John [mailto:John.Wheeler@clark.wa.gov]

Sent: Friday, June 05, 2015 4:06 PM

To: Chichester, Harry (ECY)

Cc: Stanley, Cindy

Subject: RE: Draft Oil Spill Response Plan for Clark, Cowlitz, and Lewis Counties Now Available! Clark Cowlitz GRP

Mr. Chichester,

Attached are my comments on the Cowlitz-Clark GRP. They are almost entirely concerned with the contact information. Let me know if you have any questions about these.

Do you need any other feedback from any stakeholders in Clark County? If you are concerned with any lack of information or guidance regarding the response strategies or resources at risk, let me know.

Thanks a lot for giving us an opportunity to comment on this GRP.

John Wheeler, CRESA

(360) 992-6271

m (360) 600-7771

Clark / Cowlitz

Geographic Response Plan

Comments – John Wheeler

(360) 992-6271 / john.wheeler@clark.wa.gov

#	Location	Comment
1	General comment	<p>Throughout the document, CRESA's front desk, administrative line, 737-1911, is listed. This is a non-emergency line, staffed by clerical personnel from 8-5, Mo-Fri. This is only appropriate for non-emergency administrative contact of CRESA and is not the best way to access emergency assistance.</p> <p>If the intent is for responders to access emergency assistance and other emergency contacts for Clark County public safety and supporting agencies we recommend calling 911, <i>if the responder is calling from within Clark County</i>. If they are calling from outside Clark County, they should call (360) 696-4461 for emergency support. Call (360) 693-3311 for non-emergency assistance. Both of these numbers are answered by dispatchers.</p> <p>ALSO, the GRP lists individual phone numbers for police and fire agencies. Here again, if the intent is to request emergency assistance, the best thing to do is to call 911. (If you reach them at their agency numbers, the responding personnel will have to check-in and assign through dispatch anyway. So this adds un-necessary steps.)</p> <p>The GRP should be updated throughout the document to reflect this.</p>
2	Pg.ii, Tribal Contacts	Yakima Nation s/b 'Yakama'
3	Pg. ii, NOAA, Weather	Contact number is for the <u>Seattle</u> NWS; This GRP area is covered by the Portland NWS. Call Tyree Wilde to confirm correct numbers. 503-326-2340
4	Pg. iii, Local Government	See comment #1. If the intent is to also include <i>administrative</i> numbers (8-5) for public safety agencies, also include: Vancouver Police Department Clark County Fire & Rescue (Woodland, Ridgefield, Battle Ground, La Center) Clark County Fire District. No. 6 (Hazel Dell, Salmon Creek, Felida)
5	Pg. iii, Local Government	See comment #1. CRESA's Emergency Management Duty Officer may be included in this listing. They can be contacted 24/7/365 via CRESA dispatch OR directly by calling (360) 562-0130. Note that the CRESA Emergency Management can coordinate any support

#	Location	Comment
		that may be needed from Clark County, its seven cities, and partner agencies, especially for any assistance not available through dispatch/911. This may be a better option than having responders having to hunt around for the contacts and assistance.
6	Pg. 20-21, Risk Assessment	For consideration: the Port of Vancouver is a major port with docks and facilities that store and transport oil and chemicals; Tidewater Barge is also an oil shipper. Are these worth listing separately?
7	Pg. 30, WSP, County, and Municipal Police	Here again, administrative phone numbers for police agencies are listed. See comment #1.
8	Pg. 72, BRBRC-11.6, Comments	See comment #1
9	Pg. 113, CWLZR-5.2-N, Comments	Assume this should say 'Notify City of Longview'
10	Pg. 122, SA-LEWR-14.7, Comments	See comment #1

From: Jeff Wilson [<mailto:wilsonjtt@msn.com>]

Sent: Friday, May 29, 2015 8:57 AM

To: ECY RE Geographic Response Plans

Subject: Proposed Oil Spill Plan

Hello...I have reviewed the Oil Spill Plan and had the following comments;

The proposed changes seemed hard to find or notice...

Staging areas;

This is my biggest concern...there simply is not near enough supplies and equipment needed at the staging areas...

There seem to not be enough or new areas defined to stage areas for rapid response....

Each staging area needs to be treated like a fire station more ready to go than not...there needs to be enough supplies and equipment at each staging area as to truly be effective in a speedy first response...I feel this part of the plan is inadequate and does not meet the threshold for providing an effective first response...

Require more equipment to meet the recovery needs...

Jeff Wilson

1-360-431-7864