

RESPONSE TO COMMENTS

Green River/Duwamish Geographic Response Plan

Comments Received through May 8, 2015

We appreciate the time and effort all contributors provided in developing and submitting their comments on the draft version of the Green River/Duwamish Geographic Response Plan. Comments received were categorized and may have been condensed to make them fit the format of this document. For each comment, the contributor is acknowledged by the number preceding their name on the list below.

Comments were contributed by the following individuals:

1. Chris Andersen, City of Auburn
2. Shayne Cothorn, Washington State Department of Natural Resources
3. Brian MacDonald, Washington Department of Fish and Wildlife
4. Colleen Maguire, Washington State Parks and Recreation Commission

For your convenience, the electronic version of this document has been interlinked. Simply click on the name of a person that provided comments from the list above, and you'll be taken to a copy of the email or letter they submitted. Click on a comment within their document, and you'll be taken to the page that contains our response to that particular comment.

General Comments

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 Duwamish/Green River? (2)

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? (2)

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

Comment: What mitigation efforts are proposed to avoid spills or overflows from proposed facilities associated with earthquakes? (2)

Response: Chapter 2 of the GRP provides 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, earthquake or tsunami. The development of measures to mitigate spills or overflows during and after an earthquake is outside the scope of this plan.

Comment: What measures will be taken to ensure spills or overflows do not occur due to tsunami waves? (2)

Response: Chapter 2 of the GRP provides 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, earthquake or tsunami. The development of measures to mitigate spills or overflows after a tsunami is outside the scope of this plan.

Spill Response Contact Sheet

Comment: Under "Washington State"/"Dept of Fish and Wildlife" add "Oil Spill Team (360) 534-8233*". Also, strike "Marine Office (La Conner)" from the same location. (3)

Response: The contact information for the Washington Department of Fish and Wildlife has been updated.

Comment: Replace: Washington State Parks Department with Washington State Parks and Recreation Commission (4)

Response: Washington State Parks and Recreation Commission has been corrected in the spill response contact sheet, site contact information, and references in the narrative chapters.

Chapter 2 – Site Description

Comment: Page 2-6: Additional petroleum pipelines that cross the Green River in Auburn include:

- Northwest Pipeline natural gas line which cross the river upstream of the Neely Bridge;
- Puget Sound Energy Natural gas line that crosses the river in the vicinity of 32nd St NE; and
- Puget Sound Energy natural gas distribution line that runs across the 8th Street NE bridge. (1)

Response: The focus of this plan is oil, not natural gas or natural gas condensate. Therefore, the risk presented by gas pipelines in the planning area isn't included in the GRP.

Comment: Page 2-6: Auburn Municipal Airport located at 400 23rd Street NE, Auburn, WA, is located approximately 3,000 feet west of the Green River. (1)

Response: The risk assessment in Chapter 2 has been updated to add this information.

Chapter 4 – Response Strategies & Priorities

Comment: Page 4a-26: GRD Site 30.6 – This is a park property owned and operated by City of Auburn. Suggest that point of contact should be:

City of Auburn Parks, Arts and Recreation Department
25 West Main Street
Auburn, WA 98001
Parks Administration 253-931-3043
After hours (M&O On-call) 253-876-1985 (1)

Response: The site contact for strategy GRD-30.6 has been updated.

Comment: Reorganize strategy 2-pagers to ensure that they follow consistent alpha-numeric sequences. Many of the strategies are currently out of sequence. (3)

Response: The 2-pagers for strategies, staging areas and boat launches have been re-ordered alphanumerically by short name.

Comment: Page 4A-6 - WDFW property is list as being used as a staging area. Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950" (3)

Response: Site contact information has been updated for strategy BSOO-1.3.

Comment: Page 4C-4 - Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950" (3)

Response: Site contact information has been updated for staging area SA-GRD-33.8.

Comment: Page 4D-8 - Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950" (3)

Response: Site contact information has been updated for boat launch BL-GRD-33.8.

Chapter 6 – Resources at Risk

Comment: Chapter 6 Section 6.2 - Edit "Reptile:" to read "Amphibian:" (3)

Response: Based on your comment, changes have been made to Section 6.2.

Comment: Chapter 6 Section 6.2 - Under bullet "Side channels and stream mouths...". Edit first sentence to read " ...and provide feeding and resting areas for a variety of birds, including waterfowl and herons." Strike second sentence. (3)

Response: Based on your comment, changes have been made to Section 6.2.

Comment: Chapter 6 Page 6-5: Geographic Area of Concern #4 also includes the City of Auburn's Fenster Natural Area (approximately 1,400 feet of shoreline along the left bank of the river). (1)

Response: Based on your comment, the description of Area of Concern #4 has been updated to include Fenster Natural Area.

Comment: Chapter 6 Section 6.5.3 - 3rd sentence. Insert "...of oiled wildlife..." after the word "...observations...". (3)

Response: Based on your comment, changes have been made to Section 6.5.3.

Comment: 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." (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: Appendix 6A - Under "B6" add the following fish facilities: Green River Community College Rearing Pond; Green River screw trap; Tacoma headworks trap. (3)

Response: These locations have been added to Appendix 6A.

Comment: Appendix 6A - C4 – Parks and Beaches. Add the following Auburn park "Fenster Natural Area" (located on left bank of Green River at Lat: 47.3045; Long: -122.1999) (1)

Response: This location has been added to Appendix 6A.

From: [Chris Andersen](#)
To: [ECY RE Geographic Response Plans](#)
Cc: [Sarah K Miller](#); [Jamie Kelly](#); [Jeff Dixon](#); [Chris Thorn](#)
Subject: RE: ECOLOGY NEWS: Preparing for oil spills to the Duwamish/Green River
Date: Friday, May 08, 2015 2:59:09 PM

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

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Department of Ecology,

Please find my comments regarding the draft Green River Geographic Response Plan below:

Chapter 2:

- Page 2-6: Additional petroleum pipelines that cross the Green River in Auburn include:
 - Northwest Pipeline natural gas line which cross the river upstream of the Neely Bridge;
 - Puget Sound Energy Natural gas line that crosses the river in the vicinity of 32nd St NE; and
 - Puget Sound Energy natural gas distribution line that runs across the 8th Street NE bridge.

- Page 2-6: Auburn Municipal Airport located at 400 23rd Street NE, Auburn, WA, is located approximately 3,000 feet west of the Green River.

Chapter 4:

- Page 4a-26: GRD Site 30.6 – This is a park property owned and operated by City of Auburn. Suggest that point of contact should be:

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25 West Main Street

Auburn, WA 98001

Parks Administration 253-931-3043

After hours (M&O On-call) 253-876-1985

Chapter 6:

Page 6-5: Geographic Area of Concern #4 also includes the City of Auburn's Fenster Natural Area (approximately 1,400 feet of shoreline along the left bank of the river).

Appendix 6A:

- C4 – Parks and Beaches. Add the following Auburn park "Fenster Natural Area" (located on left bank of Green River at Lat: 47.3045; Long: -122.1999)

Please feel free to contact me if I can answer any questions or provide further information regarding these comments.

Thank you,

Chris Andersen, CFM
Environmental Services Manager
City of Auburn

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May 7, 2015

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

SUBJECT: Duwamish/Green River GRP

Please accept these comments from the Washington State Department of Natural Resources (DNR) regarding the Duwamish/Green River 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 Duwamish/Green River is contained within the state of Washington with significant portions declared navigable at the time of statehood. The ownership of this river is complex so I will not go into the details at this time other than to say a significant portion of this river is state owned aquatic land (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 the single greatest threat of catastrophic impact to the health of SOAL. Much work has been done and is ongoing to restore the resources of this waterbody. DNR would like to commend the Department of Ecology for updating the GRP for this valued waterbody 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. 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 Duwamish/Green River through steep terrain where geological hazards exist. There are also pipeline crossings and adjacent rail yards that pose significantly risk. 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 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 (see 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 Duwamish/Green River?
- 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?
- 3) What mitigation efforts are proposed to avoid spills or overflows from proposed facilities associated with earthquakes?
- 4) What measures will be taken to ensure spills or overflows do not occur due to tsunami waves?

DNR recommends the following risk assessment work to analyze geologic hazards at rail yards, pipeline crossings, and along rail lines that will carry CBR that border and/or cross the Duwamish/Green River:

- 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
- 6) Identify tsunami inundation hazards from both local faults and a Cascadia subduction zone event, or through subaqueous or terrestrial landslides. Explicitly address increased risk of inundation resulting from climate change and sea level rise.

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 this waterbody.

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
Derrick Toba, Assistant Division Manager, Shoreline District

Item	Section	Page	Issue	Recommendation
1	Contact Sheet	4	Incomplete information	Under "Washington State"/"Dept of Fish and Wildlife" add "Oil Spill Team (360) 534-8233*". Also, strike "Marine Office (La Conner)" from the same location.
2	Appendix 4A	4A	Incorrect position	Reorganize strategy 2-pagers to ensure that they follow consistent alpha-numeric sequences. Some of the strategies are currently out of sequence.
3	Appendix 4A	4A-6	Incomplete information	WDFW property is list as being used as a staging area. Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950"
4	Appendix 4C	4C-4	Incomplete information	Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950"
5	Appendix 4D	4D-8	Incomplete information	Recommend editing "Site Contact" to include WDFW Soos Creek hatchery: "13030 Auburn Black Diamond Road Auburn WA, 98092 (253) 931-3950"
6	6.2	6-3	Incorrect information	Edit "Reptile:" to read "Amphibian:"
7	6.2	6-4	Simplification	Under bullet "Side channels and stream mouths...". Edit first sentence to read " ...and provide feeding and resting areas for a variety of birds, including waterfowl and herons." Strike second sentence.
8	6.5.3	6-11	Incomplete information	3rd sentence. Insert "...of oiled wildlife..." after the word "...observations...".
9	6-5	6-11	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."
10	6A	6A-6	Incomplete info	Under "B6" add the following fish facilities: Green River Community College Rearing Pond; Green River screw trap; Tacoma headworks trap.

From: [Maguire, Colleen \(PARKS\)](#)
To: [ECY RE Geographic Response Plans](#)
Subject: Draft Green River/Duwamish Geographic Response Plan (GRP) Available
Date: Wednesday, April 08, 2015 2:18:08 PM

Replace Washington State Parks with Washington State Parks and Recreation Commission

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