

RESPONSE TO COMMENTS

Nisqually River Geographic Response Plan

Comments Received through May 20, 2015

We appreciate the time and effort all contributors provided in developing and submitting their comments on the draft version of the Nisqually River 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) Kim Bredensteiner, Nisqually Land Trust
- (2) Shayne Cothorn, WA-DNR
- (3) Micah Goo, Centralia City Light
- (4) Brian MacDonald, WDFW
- (5) Fred Michelson, Nisqually River Foundation
- (6) Allison O'Brien, US-DOI
- (7) Mark Toy, WA-DOH Shellfish

General Comments:

Comment: Who is responsible for writing the EIS's for the Proposed Coal and Oil Terminals? If they are different managers then separate those folks for my contact. I am also interested to speak to their affiliates at WADOT who have responsibility for railway crossing safety. (5)

Response: The county planning offices where these projects are located are points of contact for the projects. Information is provided for coal and oil facility proposals where Ecology is a lead or co-lead agency for an EIS. Ecology's point of contact for the proposed Millennium Bulk Terminals Longview (MBTL) in Cowlitz County, and proposed Westway and Imperium Expansion Projects in Grays Harbor is Diane Butorac; 360-407-6594, dbut461@ecy.wa.gov. Fran Sant is Ecology's point of contact for the proposed Grays Harbor Rail Terminal (GHRT) project; 360-407-6004, fsan461@ecy.wa.gov. Alice Kelly is Ecology's point of contact for the proposed Gateway Pacific Terminal at Cherry

Point and proposed Shell Anacortes rail unloading facility; 425-649-7128, akel461@ecy.wa.gov. Washington Utilities and Transportation Commission have certain responsibilities related to rail crossing safety. The commission can be reached at 360-664-1160 and also has information about rail crossing safety on their website at <http://www.utc.wa.gov/publicSafety/railSafety/Pages/aboutRailSafetyProgram.aspx>.

Comment: I would suggest that some watershed semi official folks be allowed or suggest they be allowed to attend these training alerts and to be integrated with your agency personnel to grade or score the practice alerts. If this is already done is it scored in any way for readiness and operational success of mission? I am concerned about having those responsible for booming and actual teams having visited the sights and actually writing how the actual readiness package and team would assess it and make out lists of needs to accomplish effective response materials and personnel. The plan should impact funding for these responders to practice and train in actual alerts called into Ecology and to see the results of such practice alerts. (5)

Response: Washington State approved contingency plan holders are required to perform two GRP response strategy deployments each year. Lessons learned from these deployments are recorded and used to improve existing response strategies, making geographic response plans more effective over time. Each company/contingency plan holder is required to conduct a large-scale drill once every 3 years. Large-scale drills demonstrate a company's ability to call in sufficient response resources for a worst case spill event. Response resources include personnel and equipment such as workboats, skimmers, storage, and boom. If there is any shortage of available equipment, these drills are intended to identify it before a real spill occurs. Information on drills is available at <http://www.ecy.wa.gov/programs/spills/preparedness/Drills/Drills.html>. Ecology's drill evaluation checklist is available at <http://www.ecy.wa.gov/programs/spills/preparedness/Drills/Drillchecklist.docx>. The drill calendar shows upcoming drills throughout the year and is available at <https://fortress.wa.gov/ecy/naces>. Information on Washington State approved contingency plan holders is available at <http://www.ecy.wa.gov/programs/spills/preparedness/cplan/cpmanagers.htm>. Local governments, tribal nations and other trustee agencies can submit requests to observe drills to Ecology's Preparedness Section Drill Lead at hzor461@ecy.wa.gov.

Comment: The GRP cannot be considered complete and adequate until a maintenance, monitoring and response plan is developed comparable to the risk posed and presented to the public for review and comment. (2)

Response: The development of a maintenance, monitoring and response plan falls outside the scope of the GRP update and development process.

Comment: What measures exist and/or will be implemented to assess, repair, and maintain rail to a condition suitable to CBR transport- especially in areas where derailment would impact state waters? (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.

Spill Response Contact Sheet (Draft Plan):

Comment: Incomplete information on Page ii under Washington State Dept of Fish and Wildlife; add "Oil Spill Team (360) 534-8233*." (4)

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

Comment: Incomplete information on Page ii under Washington State Dept of Fish and Wildlife; add "Region 6 (360) 249-4628." (4)

Response: Based on your comment, WDFW Region 6 information has been added to the Contact Sheet.

Chapter 2 – Site Description (Draft Plan):

Comment: On page 2-1, last paragraph, you say the Centralia Canal runs 8 miles. It should be 9.1 miles (3)

Response: Based on your comment, information regarding the length of the Centralia Canal has been changed in Section 2.1 of the plan.

Comment: Do you want to mention the Williams Northwest Gas Pipeline that runs across or canal on page 2-5? (3)

Response: No. The focus of this plan is oil, not natural gas or natural gas condensate. Therefore, the risk presented by gas pipelines over the canal and other streams in the planning area isn't included in the GRP.

Comment: Rail crosses the Nisqually River at river miles 4 and 20. In Site Description section the rail hazard component does not properly present current risk posed by crude by rail unit trains. Risks posed by derailment and threat of terrorism are all considerations that should be mentioned here. Pipelines carrying oil also cross the Nisqually River. Specifics regarding current volume moving through this area should be stated and updated along with GRP. We must identify and mitigate where possible the risks adjacent to rail and pipelines carrying oil. (2)

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.

Chapter 4 – Response Strategies and Priorities (Draft Plan):

Comment: It is confusing how the northern boundary of the Nisqually River GRP is the southern boundary of the DNR managed Nisqually Reach Aquatic Reserve (NRAR-see attachment below). This places the NRAR within the South Puget Sound GRP instead of GRP for which NRAR was named. There is also some overlap between SPS-3 and NR-1. The NRAR should be referenced in one or both of these GRPs until this issue is resolved. (2)

Response: The planning area for the Nisqually River GRP is bordered by the South Puget Sound GRP to the north, along the north side of the Nisqually River Delta. The previous Nisqually River GRP overlapped a large segment of South Puget Sound creating a planning area conflict between the two GRPs. This issue was corrected in the update to this plan through the redrawing of GRP boundaries; overlapping planning areas no longer exist between the Nisqually River and South Puget Sound GRPs. A future update to the South Puget Sound GRP will show this new boundary and should include information about the Nisqually Reach Aquatic Reserve since it primarily resides in South Puget Sound.

Comment: On page 4-4, one of the "questions to ask" before deploying a GRP Strategy is "How far downstream or out into the marine environment is the spilled oil likely to travel before response personnel will be ready and able to deploy GRP response strategies?" How is the downstream extent of oil movement determined? (6)

Response: During this plan update, the speed which oil might move down the Nisqually River was derived through discussions with people that live, work, and play on or near the river. This included discussions with local fishermen, WDFW enforcement officers, dam operators, persons that kayak/raft the river, and others.

Comment: On page 4-8, the historic monthly streamflow is provided for two long-term sites on the Nisqually River. This data has some utility in a flood response, but does provide an idea of what can be expected. A more suitable resource would be the discharge at the time of the spill. The text mentions that more information on the U.S. Geological Survey (USGS) river gage readings can be found online at USGS's national map of real-time data. This is a useful link, but providing direct links to real-time data at specific sites would expedite data retrieval. (6)

Response: Historic streamflow volumes (monthly mean) were derived from USGS gage station data. They are included in the plan so responders can get an idea of the volume (cfs) of flow that might be present during different months of the year. The information shows that the river is not static; seasonal variations to streamflow exist and volumes can change substantially from month to month. In the draft plan, the headers in table 4-2 were hyperlinked to the USGS website for each gage station provided. In the final plan, USGS website links have been broken out from the header and are now displayed independently (below the table).

Comment: The GRP should mention that real-time river discharge and stage data is available and include direct links to the data. Please see the following example of how this information could be listed; USGS has provided each station's URL for your information, but it could be encoded in the station number as a hyperlink: (6)

12082500 - Nisqually River near National, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12082500&PARAMeter_cd=00060,00065

12083000 - Mineral Creek near Mineral, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12083000&PARAMeter_cd=00060,00065

12086000 - Nisqually River at La Grand Dam, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12086000&PARAMeter_cd=00060,00065

12086500 - Nisqually River at La Grand, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12086500&PARAMeter_cd=00060,00065

12088000 - Ohop Creek near Eatonville, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12088000&PARAMeter_cd=00060,00065

12089208 - Centralia Power Canal near McKenna, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12089208&PARAMeter_cd=00060,00065

12089500 - Nisqually River at McKenna, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12089500&PARAMeter_cd=00060,00065

Response: Based on your comment, USGS gage stations for the Nisqually River that fall within the planning area have been added, with direct links to the USGS website for each station provided. Gage stations for Nisqually River near National (12083000), Mineral Creek near Mineral (12086000), and Ohop Creek near Eatonville (12089208) were not included because they reside outside of the GRP planning area.

Comment: Figure 4-1 on page 4-9 should contain symbols for the USGS sites listed above. (6)

Response: Based on your comment, symbols for USGS gage stations in the planning area have been added to figure 4-1.

Comment: Rather than deploying the boom strategies depicted on pages 79 and 81 (4A-3 and 4A-5), we recommend placing a response strategy straight across the canal upstream of the powerhouse. This would prevent oil from going down either side of the canal at the powerhouse. (3)

Response: Placing boom straight across the canal could lead to entrainment; oil escaping under the boom as streamflow reaches or exceeds 0.7 knots. Based on your comment, response strategy CCAM-0.15L has been changed to a Collection/Exclusion type strategy which should allow oil collection upstream of the powerhouse and exclude oil from the powerhouse water intakes on canal left.

Comment: Cleaner photos (boom diagram images) are needed for response strategies CCAN-7.96 and CCAN-8.0 on pages 83 and 85 (4A-7 and 4A-9). (3)

Response: Based on your comment, zoom levels have been adjusted in our database to provide less blurry imagery for response strategies CCAN-7.96 and CCAN-8.0.

Comment: Please use the following contact information for the Nisqually Land Trust: (1)

Nisqually Land Trust
1420 Marvin Road NE
Suite C PMB 243
Lacey, WA 98516

Response: Based on your comment, contact information for Nisqually Land Trust has been updated for response strategies OHPC-1.7 and OHPC-1.9.

Comment: Notification strategy NR-13.2-N on page 149 indicates fish ladder(s) as a resource at risk of injury from oil spills near the powerhouse. There is no Fish Ladder at or near this location. There is a fish counter upstream and the fish weir down by the tank crossing, but no fish ladder. Also, I'm not sure which wetlands restoration site you might be referring to in the resources at risk section of that strategy. (3)

Response: Based on your comment, the resources at risk section for Notification strategy NR-13.2-N has been updated.

Comment: The location information table for staging area SA-NR-13.2 (Centralia Power House) does not include additional parking space in the upper lot next to the office compound. At least 15 cars could park in that lot. (3)

Response: Based on your comment, the number of spaces available for car parking at staging area SA-NR-13.2 has been increased from 10 to 25 unmarked spaces.

Comment: For staging area SA-MCALC-0.0 under "Site Contact" recommend that you also include: (4)

WDFW Region 6
48 Devonshire Road
Montesano, WA 98563
Phone: (360) 249-4628

Response: Based on your comment, WDFW Region 6 has been added as a site contact for staging area SA-MCALC-0.0.

Comment: The boat ramp represented on the NR-1 sector map is at Luhr Beach and has a relatively small staging area. If more equipment needs to be staged or deployed, Solo Point, approximately 3 miles north of the delta along the eastern shoreline of the

Nisqually Reach has a large open staging area. It is part of JBLM and is not available for public use, although "State and tribal" vehicles and use are permitted. (2)

Response: Solo Point is an option for boat launching and staging but it's located over 5-miles away from the boat launch at Luhr Beach. Solo Point resides in the South Puget Sound GRP planning area (SPS GRP) and will likely be developed as a boat launch and staging area during a future update to that plan.

Comment: For boat launch area BL-MCALC-0.0 under "Site Contact" recommend that you also include: (4)

WDFW Region 6
48 Devonshire Road
Montesano, WA 98563
Phone: (360) 249-4628

Response: Based on your comment, WDFW Region 6 has been added as a site contact for staging area BL-MCALC-0.0.

Chapter 6 – Resources at Risk (Draft Plan):

Comment: The Nisqually tribe has been doing extensive beach seining surveys in the delta and lower river area to look at the use and distribution of salmon throughout the lower river, delta, associated saltmarsh and the Reach. This information would be helpful in assessing resources at risk and for damage assessment. (2)

Response: Once completed, the results of beach seining surveys for the lower Nisqually River and delta can be sent to GRPS@ecy.wa.gov. Then the information can be reviewed by Washington Department of Fish and Wildlife (WDFW) and other trustee agencies, and compared to existing data on resource at risk locations in the area. If the use and distribution of salmon in the planning area have changed, such information can be included in Section 6.2 during a future update to the plan.

Comment: A review of DNR managed aquatic reserves and resources they contain should be conducted and considered for all GRP assessments. For a map of all our reserves see l.usa.gov/aqreserve. We will soon have an aquatic resources interactive data map viewer tool available to the public that can be used to more quickly assess resources at risk as well as identifying various staging locations. We will be sure to notify Ecology when this tool is available for use. (2)

Response: Ecology is familiar with Washington Department of Natural Resources (DNR) managed aquatic reserves. All known sensitive resource locations, including the reserves, were considered in the update to this plan. We look forward to DNR's development of an aquatic resources interactive data map viewer and will likely use the tool in future GRP update and development work once it becomes available.

Comment: Please incorporate the following as generic guidance for this and other GRPs on notification and response for shellfish safety: "Commercial and Recreational Shellfish Harvesting: Immediately contact the Washington State Department of Health (WDOH) Shellfish Programs if an oil spill threatens commercial or recreational shellfish harvest areas. WDOH can be reached at (360) 236-3330 during normal business hours and after hours at (360) 789-8962. On-call duty staff can also be contacted by e-mail at sf.growingarea@doh.wa.gov. The Washington State Department of Health (WDOH) maintains an interactive map that shows the location of commercially and recreationally classified shellfish beaches. This information can be viewed at: <https://fortress.wa.gov/doh/eh/maps/OSWPViewer/index.html>. Guidance for responders on managing impacts to shellfish growing areas is detailed in Section 9409 of the NW Area Contingency Plan: <http://www.rrt10nwac.com/Files/NWACP/2015/Section%209409.pdf>. WA-DOH Shellfish needs to be contacted as soon as possible when a spill occurs to close shellfish areas if needed and to avoid recall of product. (7)

Response: Based on your comment, information about commercial and recreational shellfish harvesting areas has been added to Section 6.4 of the plan.

Comment: Possible incorrect information on page 182. 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. (4)

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

Comment: Incomplete information on page 182. In the 3rd sentence insert the words "of oiled wildlife" after the word "observations." (4)

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

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." (4)

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: Incorrect information on page 176 (3rd bullet). Please edit the text in the first sentence to read "Smelt and sandlance spawning habitat present along marine shorelines of the Nisqually Delta" and strike the second sentence. (4)

Response: Based on your comment, changes have been made to Section 6.2.1b.

Appendix A – Protection Techniques (Draft Plan):

Comment: It is noted that "Additional information on calculating river velocities can be found in Appendix A." Appendix A describes a method of timing drift between two buoys set 100 feet apart. This may be appropriate for determining surface velocity at a specific spot for boom placement, but it is not accurate in determining mean velocity to estimate travel times of a spill on a river reach. At a minimum, a table of mean velocities for various stages of the river should be provided for the sites listed above. USGS collects this information while measuring discharge at the sites it maintains and could readily assemble the data into a table. A better solution would be to incorporate a hydraulic model such as River Spill (Samuels et al, 2002). This model incorporates real-time discharge data to determine the travel times of contaminants and provides a mapping interface to show when the spill will reach particular locations, such as hatcheries or water supply intakes. (6)

Response: We agree that the drift tables in Appendix A and Chapter 4 are meant to calculate river speed/velocity at a specific point on the river. Such measurements would vary greatly from one location to the next and the time of year the measurements were taken. Ecology is interested in any support the Department of the Interior or U.S. Geological Survey (USGS) might be able to provide to calculate mean velocities of major

rivers in Washington State based on river stage. Currently, we are looking to see if hydraulic models using GIS (as describe by Dr. Samuels) can be developed in-house using our GIS system. If successful, this would greatly aid us in determining the downstream extent oil might travel over time.



May 14, 2015

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

Subject: Nisqually River Geographic Response Plan

To Whom It May Concern:

Please accept these comments from the Washington State Department of Natural Resources (DNR) regarding the Nisqually River Geographic Response Plan (GRP).

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 (SOAL). The Nisqually River is contained within the state of Washington with significant portion declared navigable at the time of statehood. These river miles are state owned aquatic lands managed by the Department of Natural Resources for the citizens of the state.

Oil spills represent the single greatest risk of catastrophic impact to resources on SOAL. 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, citizens and the 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. GRPs are an excellent strategy to ensure immediate productive response 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 been mitigated for, GRPs must be developed to respond effectively and

Nisqually River GRP Comments

May 15, 2015

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efficiently. In a riverine system, this means time is of the essence and adequate equipment and personnel must be staged accordingly. As risks increase so should the level of preparedness. Rail crosses the Nisqually River at river miles 4 and 20. In Site Description section the rail hazard component does not properly present current risk posed by crude by rail unit trains. Risks posed by derailment and threat of terrorism are all considerations that should be mentioned here. Pipelines carrying oil also cross the Nisqually River. Specifics regarding current volume moving through this area should be stated and updated along with GRP. We must identify and mitigate where possible the risks adjacent to rail and pipelines carrying oil.

There currently exists a large gap in contingency planning by the State. Oil handling facilities are held to a high planning standard, yet rail lines and pipelines moving 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 the Department of Ecology to move forward as quickly as possible to fill this gap by completing all necessary rulemaking and planning efforts.

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 in areas where derailment would impact state waters?
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 along rail lines and pipelines that will carry crude oil:

- a) 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;
- b) Evaluate riverbank sloughing and subaqueous landslide hazards using bathymetry or similar

DEM data;

- c) 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;
- d) 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; and
- e) Evaluate earthquake hazards including earthquake-induced liquefaction and other earthquake-induced ground failures.

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 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 should increase comparable to increased risk posed by volumes moving along route.

The Nisqually River GRP cannot be considered complete and adequate until a maintenance, monitoring and response plan is developed comparable to the risk posed and presented to the public for review and comment.

Additional Comments:

It is confusing how the northern boundary of the Nisqually River GRP is the southern boundary of the DNR managed Nisqually Reach Aquatic Reserve (NRAR-see attachment below). This places the NRAR within the South Puget Sound GRP instead of GRP for which NRAR was named. There is also some overlap between SPS-3 and NR-1. The NRAR should be referenced in one or both of these GRPs until this issue is resolved.

A review of DNR managed aquatic reserves and resources they contain should be conducted and considered for all GRP assessments. For a map of all our reserves see 1.usa.gov/aqreserve. We will soon have an aquatic resources interactive data map viewer tool available to the public that can be used to more quickly assess resources at risk as well as identifying various staging locations. We will be sure to notify Ecology when this tool is available for use.

Nisqually River GRP Comments

May 15, 2015

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The boat ramp represented on the NR-1 sector map is at Luhr Beach and has a relatively small staging area. If more equipment needs to be staged or deployed, Solo Point, approximately 3 miles north of the delta along the eastern shoreline of the Nisqually Reach has a large open staging area. It is part of JBLM and is not available for public use, although "State and tribal" vehicles and use are permitted.

The Nisqually tribe has been doing extensive beach seining surveys in the delta and lower river area to look at the use and distribution of salmon throughout the lower river, delta, associated saltmarsh and the Reach. This information would be helpful in assessing resources at risk and for damage assessment.

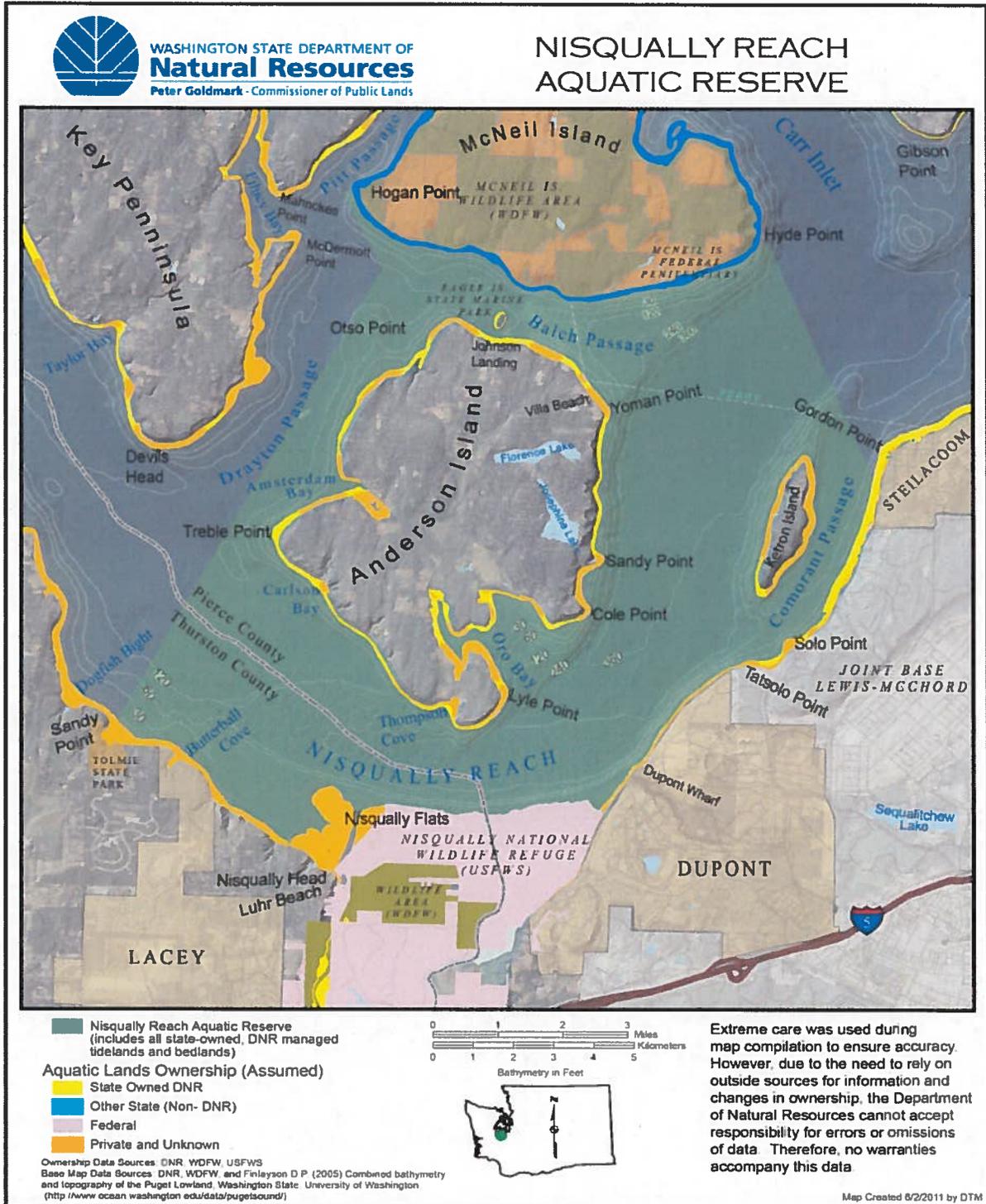
Should you have any questions regarding these comments, please do not hesitate to contact me at (360) 902-1064. If you have questions specific to geologic hazard risk assessment please contact, Tim Walsh, our State Chief Hazards Geologist at (360) 902-1432.

Sincerely,



Shayne Cothorn
Spill Response Coordinator
Department of Natural Resources

- c: Kristin Swenddal, Aquatics Division Manager
- Dave Norman, Geology Division Manager
- Derrick Toba, Assistant Division Manager, Shoreline District



From: Micah Goo [mailto:MGoo@cityofcentralia.com]
Sent: Tuesday, April 28, 2015 3:03 PM
To: Butsick, Danielle (ECY)
Subject: RE: Draft Nisqually River Geographic Response Plan

Hi Danielle,

A couple items on the draft GRP.

Pg. 2-1 last paragraph: The Centralia Canal runs 8 miles. It is 9.1 miles
Pg. 2-5 Do you want to mention the Williams Northwest Gas Pipeline that runs across or canal?
Pg. 79 & 81; 4A-3 & 4A-5 photos of boom across canal: We recommend going straight across as in drawing 3. This would prevent any oil going down either side.
Pg. 83 & 85; 4A-7 & 4A-9: Cleaner photos attached. (drawing 1 = Area 1 & drawing 2 = Area 2)
Pg. 149 Resources at Risk: There is no Fish Ladder near the power house; there is a fish counter upstream and the fish weir down by the tank crossing. Also not sure of which wetlands restoration site you are referring to.
Pg. 159; NR-13.05-Location information table: Parking-Car = at least 15 cars at upper parking area next to office compound.

Hope this helps

Micah Goo
Generation Manager
Centralia City Light
Office: (360) 330-7512 Ext: 400
Cell: **(360) 556-8679**



Chichester, Harry (ECY)

From: ECY RE Geographic Response Plans
Subject: Nisqually River GRP review comments
Attachments: Nisqually Rv GRP Review WDFW 05142015.xlsx

From: Macdonald, Brian F (DFW)
Sent: Friday, May 15, 2015 2:43 PM
To: ECY RE Geographic Response Plans
Subject: Nisqually River GRP review comments

To whom it may concern.

The WDFW Oil Spill Team has reviewed the draft Nisqually River 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

Nisqually River GRP review				
WDFW - Brian MacDonald		5/14/2015		
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	Contact Sheet	ii	Incomplete information	Under "Washington State"/"Dept of Fish and Wildlife" add "Region 6 (360) 249-4628".
3	Appendix 4C	156	Incomplete information	Under "Site Contact" recommend also including " WDFW Region 6, 48 Devonshire Road, Montesano, Washington 98563, Telephone (360) 249-4628
4	Appendix 4D	165	Incomplete information	Under "Site Contact" recommend also including " WDFW Region 6, 48 Devonshire Road, Montesano, Washington 98563, Telephone (360) 249-4628
5	6.2.1b	176	Incorrect information	3rd bullet, edit the text in the first sentence to read "Smelt and sandlance spawning habitat present along marine shorelines of the Nisqually Delta." Strike the second sentence.
6	6.5.2	182	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 stiking 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.

7	6.5.3	182	Incomplete information	3rd sentence. Insert "...of oiled wildlife..." after the word "...observations...".
8	6-5	182	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."

Chichester, Harry (ECY)

From: Fred Michelson [fredndanrc@aol.com]
Sent: Friday, April 24, 2015 3:21 PM
To: Butsick, Danielle (ECY)
Subject: Spill response plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Danielle:

Thank you for your work on the Nisqually Watershed Spill Response Plan. I have read it twice and still massaging it in my thoughts. It seems good so far. I am concerned about having those responsible for booming and actual teams having visited the sights and actually writing how the actual readiness package and team would assess it and make out lists of needs to accomplish effective response materials and personnel.

In other words the plan should impact funding for these responders to practice and train in actual alerts called into Ecology and to see the results of such practice alerts.

Next, I would be very pleased if you could please find out who I may marry up with at Ecology who is responsible for writing the EIS's for the Proposed Coal and Oil Terminals? If they are different managers then separate those folks for my contact.

I am also interested to speak to their affiliates at WADOT and who have responsibility for railway crossing safety.

Anything you can provide would very be helpful.

Fred Michelson
Chair, CAC of NRC

Chichester, Harry (ECY)

From: O'Brien, Allison [allison_o'brien@ios.doi.gov]
Sent: Wednesday, May 20, 2015 3:48 PM
To: ECY RE Geographic Response Plans
Cc: Brian Milchak; Cynthia Barton
Subject: DOI Comments on Draft Nisqually River Geographic Response Plan (GRP)

The Department of the Interior has reviewed the Washington Department of Ecology's Draft Nisqually River Geographic Response Plan (GRP). The following comments should be considered before the GRP is finalized:

1. On page 4-4, one of the "questions to ask" before deploying a GRP Strategy is "How far downstream or out into the marine environment is the spilled oil likely to travel before response personnel will be ready and able to deploy GRP response strategies?"

How is the downstream extent of oil movement determined?

2. On page 4-8, the historic monthly streamflow is provided for two long-term sites on the Nisqually River. This data has

some utility in a flood response, but does provide an idea of what can be expected. A more suitable resource would be the discharge at the time of the spill. The text mentions that more information on the U.S. Geological Survey (USGS) river gage readings can be found online at USGS's national map of real-time data. This is a useful link, but providing direct links to real-time data at specific sites would expedite data retrieval. Also, the GRP should mention that realtime river discharge and stage data is available and include direct links to the data. Please see the following example of how this information could be listed; USGS has provided each station's URL for your information, but it could be encoded in the station number as a hyperlink:

USGS Station Number:

Station Name:

12082500

Nisqually River near National, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12082500&PARAMeter_cd=00060,00065

12083000

Mineral Creek near Mineral, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12083000&PARAMeter_cd=00060,00065

12086000

Nisqually River at La Grand Dam, WA

http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12086000&PARAMeter_cd=00060,00065

12086500 Nisqually River at La Grand, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12086500&PARAMeter_cd=00060,00065

12088000 Ohop Creek near Eatonville, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12088000&PARAMeter_cd=00060,00065

12089208 Centralia Power Canal near McKenna, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12089208&PARAMeter_cd=00060,00065

12089500 Nisqually River at McKenna, WA
http://waterdata.usgs.gov/wa/nwis/uv/?site_no=12089500&PARAMeter_cd=00060,00065

3. On page 4-9, Figure 4

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1 should contain symbols for the sites listed above.

4. On page 4-8 and in Appendix A, it is noted that "Additional information on calculating river velocities can be found in Appendix A." Appendix A describes a method of timing drift between two buoys set 100 feet apart. This may be appropriate for determining surface velocity at a specific spot for boom placement, but it is not accurate in determining mean velocity to estimate travel times of a spill on a river reach. At a minimum, a table of mean velocities for various stages of the river should be provided for the sites listed above. USGS collects this information while measuring discharge at the sites it maintains and could readily assemble the data into a table. A better solution would be to incorporate a hydraulic model such as River Spill (Samuels et al, 2002). This model incorporates realtime discharge data to determine the travel times of contaminants and provides a mapping interface to show when the spill will reach particular locations, such as hatcheries or water supply intakes.

If you have any questions or concerns regarding these comments, please feel free to contact me at (503) 326-2489. We appreciate the opportunity to comment.

Have a great day,
Allison

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Allison O'Brien
Regional Environmental Officer
U.S. Department of the Interior
620 SW Main St., Ste. 201
Portland, Oregon 97205
Phone: 503-326-2489
Mobile: 503-720-1212

Chichester, Harry (ECY)

From: Toy, Mark C (DOH)
Sent: Monday, May 04, 2015 4:01 PM
To: ECY RE Geographic Response Plans
Cc: Berbells, Scott (DOH)
Subject: Nisqually River Geographic Response Plan comments

Categories: Yellow Category

To Whom It May Concern – Please incorporate the following as generic guidance for this and other GRPs on notification and response for shellfish safety:

Commercial and Recreational Shellfish Harvesting

Immediately contact the Washington State Department of Health (WDOH) Shellfish Programs if an oil spill threatens commercial or recreational shellfish harvest areas. WDOH can be reached at (360) 236-3330 during normal business hours and after hours at (360) 789-8962. On-call duty staff can also be contacted by e-mail at sf.growingarea@doh.wa.gov.

The Washington State Department of Health (WDOH) maintains an interactive map that shows the location of commercially and recreationally classified shellfish beaches. This information can be viewed at: <https://fortress.wa.gov/doh/eh/maps/OSWPViewer/index.html>

Guidance for responders on managing impacts to shellfish growing areas is detailed in Section 9409 of the NW Area Contingency Plan: <http://www.rrt10nwac.com/Files/NWACP/2015/Section%209409.pdf>

We need to be contacted as soon as possible when a spill occurs to close shellfish areas if needed to avoid recall of product. Please let me know if you need any additional information.

Mark Toy, P.E., R.S.
Office of Environmental Health & Safety, Division of Environmental Public Health
Washington Department of Health, P.O. Box 47824, Olympia WA 98504-7824
E-Mail: mark.toy@doh.wa.gov
Phone: (360) 236-3321

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