RESPONSE TO COMMENTS

Moses Lake / Crab Creek Geographic Response Plan

Comments Received through April 3, 2015

We appreciate the time and effort all contributors provided in developing and submitting their comments on the draft version of the Moses Lake / Crab Creek 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) Laura Ackerman, The Lands Council
(2) Dennis Beich
(3) Corina Hayes, Washington Department of Health
(4) Ken Mattson
(5) Michael Kuntz, Yellowstone Pipe Line Company
(6) Brian MacDonald, Washington Department of Fish and Wildlife
(7) Eric McConnell

General Comments:

Comment: The EPA enforcement for SPCC plans and secondary containment is not that active and I have been told by Ecology that you are looking to Fire Marshals for regulation and inspections. (4)

Response: Policy on the enforcement of SPCC plans and secondary containment falls outside the scope of this plan. SPCC is a federal regulation and is not delegated to the State of Washington. We believe the requirement you cite falls under the International Fire Code (IFC) which was incorporated by reference into the State Uniform Building Code (see RCW 19.27.031) and is administered at either the county or city level (usually counties unless the city is very large). Within that code, tanks holding flammable or combustible liquids must have secondary containment which in some cases may be a double-walled tank.

Comment: I suggest that in order to prevent spills, that secondary containment for above ground tanks have a plan for enforcement. (4)

Response: Your concern is noted. For aboveground storage tanks that are subject to Chapter 173-180 WAC, enforcement for compliance with the secondary containment requirements is conducted by our Prevention Section. All other tanks are subject to either the federal SPCC regulation or the IFC. A plan for enforcement of secondary containment requirements around above surface tanks (ASTs) falls outside the scope of this plan.

Spill Response Contact Sheet (Draft Plan):

Comment: Please list Yellowstone Pipe Line Co on Page 4 Spill Contact Sheet 1-877-267-2290. (5)

Response: The contact sheet has been updated and now includes a contact number for Yellowstone Pipe Line Company.

Comment: Incomplete information: Under "-Other Contact Numbers-", "Dept. of Fish and Wildlife", insert new bullet at top of list and insert "Oil Spill Team (360) 534-8233. (6)

Response: The contact sheet has been updated and now includes the contact number for WDFW Oil Spill Team.

Chapter 2 – Site Description (Draft Plan):

Comment: Your description of the area above Brooke Lake from Wilson Creek to Irby does not capture the several thousand acre peat system which was formally called Crab Lake. The railroad runs along and across this unique eastern WA system. I mention this because I would assume response and clean up for a peat system is going to be different than for other areas of Crab Creek and should be recognized and articulated in the plan. (2)

Response: Based on your comment, information about peatlands between the towns of Wilson Creek and Krupp/Marlin has been added to Section 2.2 of the plan.

Comment: You need to check with Ephrata BOR as there will be a new flow regime implemented in Crab Creek from Brooks Lake to Mosses Lake starting soon. (2)

Response: The Bureau of Reclamation identified Crab Creek and Frenchman Hills Wasteway as the preferred alternative to supply additional water to the South Columbia Basin Irrigation District (SCBID). This alternative releases feed water from Billy Clapp Reservoir through a 4ft by 4ft outlet into Brook Lake, a natural waterbody within the Crab Creek channel. Approximately 100cfs of base flow is released from Billy Clapp Reservoir year-round with a larger spring feed of up to 500cfs between April 1 and June 30. This flow regime lasts two seasons and is expected to repeat every decade; between cycles, perennial flows are resumed. The increased flow rates of 100cfs to 500cfs are not expected to significantly impact the implementation of downstream response strategies. Based on your comment, information about this occasional change in flow regime for Crab Creek has been added to Section 2.6 of the plan.

Comments: More mention of the potential problems with the Yellowstone Pipeline needs to occur in the GRP. Many problems can occur with pipelines, and not detected for days. The state needs to know more about the volume, etc. of the oil coming through the pipeline. (1)

There are areas that are identified in the draft introduction that have not been included in the response Methods, Matrices, or Staging Area planning. First, the Yellowstone Pipeline has been excluded from the draft entirely, with exception to Section 2.6. The volume of petroleum transported through the pipeline within this region should be included due to the high impact of any pipeline failure. (7)

Response: The Risk Assessment in Section 2.6 was created as an overview of oil spill risks in the area. Detailed information about such risks is included in other plans like the state approved contingency plan for the Yellowstone Pipeline. In this, we feel the amount of information provided in the Moses Lake / Crab Creek GRP concerning the Yellowstone Pipeline is adequate for the intended purposes of the plan.

Comments: The BNSF line that runs 22 miles adjacent to the creek near Wilson Creek also needs to have more discussion of spill containment. That is potentially a disastrous situation if an oil train derails and explodes there. As DOE knows, oil train transportation has increased in WA State. It could increase more, depending on facilities built. And while it's likely that oil unit trains would probably not travel along this part of the BNSF line, it's a possibility in the future if there is complete build out for proposed facilities. (1)

BNSF rail line that runs adjacent to Crab Creek for approximately 22 miles from Odessa, WA to Wilson Creek, WA. The bridge crossings have, in part, been identified in the draft.

Yet, the draft does not address containment of spills along this adjacent passage of oil transport to Crab Creek. Access to the creek is more remote due to limited roads and the potential for spill is higher due to the proximity to the creek, topography, increasing number of oil loaded trains, and the parallel passage of these trains to the drainage. (7)

Response: Unit trains, highways/roadways, and pipelines present an oil spill risk to Crab Creek. Efforts to control and contain a spill at or near the source are higher priorities than the deployment of GRP response strategies. Describing how a spill might be controlled and contained is incident specific, falling outside the scope of this plan. GRPs focus on the implementation of response strategies (primarily boom in the water strategies) to collect oil before sensitive resources are impacted or to deflect and exclude oil away from those resources (natural, cultural, and economic). The ICS-201 form followed later by the Incident Action Plan (plans specific to the incident itself) would include objectives and actions related to source control and containment. Unfortunately, not all sensitive resources can be protected because physical and environmental factors limit us; such factors include inadequate site access (including no road or boat access to a site), poor anchoring points, shallow water/mud flats, surface and underwater obstructions, worker safety, private property rights, adverse weather, fast/strong currents or streamflow, and the potential to do more harm to sensitive resources than good. Access limitations between Odessa and Wilson Creek make the implementation of response strategies for much of that area impractical for GRP purposes.

Comments: An explosion and fire resulting from a derailment would be far worse for the contamination and clean up issue. If an explosion and fire happened it would just have to burn itself out. First responders don't have the capacity to put it out quickly. It would also take a few hours to get a command center into place, and this would increase the chances for contamination via more spillage. Can you give estimates for response times for spills? (1)

Ignition/explosion of an oil spill is not mentioned at any point in the draft. If this is encompassed in the NW Contingency Plan, then it might be beneficial to indicate such links in the draft. (7)

Response: After an incident occurs the response would initially fall under an Incident Command (IC) structure, led by an incident commander from local fire, police, or emergency management. As a significant incident grows and develops, a Unified Command (UC) response structure would form, replacing the IC. The UC would consist of a Federal On-Scene Coordinator (FOSC), a State On-Scene Coordinator (SOSC), Local and Tribal On-Scene Coordinators (LOSC/TOSC), and the Responsible Party's Representative (RP). Decisions on whether to extinguish a fire or let it burn are incident specific and fall outside the scope of this plan. Ultimately, such a decision would be up to the IC or UC, as appropriate. Planning standards exist for the Yellowstone Pipeline

that show how much boom, storage, recovery/skimming capacity could be available over 2-hours, 6-hours, 12-hours, 24-hours, and 48-hours. Planning standard spreadsheets can be viewed at ftp://ecy.wa.gov/spills/Planning%20Spreadsheets. Information on planning standards can be found at http://www.ecy.wa.gov/programs/spills/preparedness/PlanningStandards/PlanningStandards.html. Ignition/explosion risks would be incident specific and fall outside the scope of this plan. NWACP Section 2233 "Operational Safety Issues Associated with Bakken Crude" and Section 4622 "Gasoline and Other Flammable Liquids Response Policy" provide guidance related to volatile vapors and fire/explosion risks.

Comment: Because making sure humans are safe in the event of a spill and fire, and rightly so, the environment will suffer more because it's not the first thing that is dealt with. That's why we need to put more emphasis on prevention of spills and leaks. (1)

Response: Yes - oil spill prevention is always preferred over oil spill response. After an incident occurs, public safety and the safety of first responders are paramount.

Comments: An above ground tank without the required secondary containment (EPA's Spill Prevention Contain Countermeasure Plan) caused the recent Sulphur Creek spill. There are farms and tanks along this Moses Lake/Crab Creek Geographic Response Plan that present a similar risk. Please consider these oil and fuel tank risks in the development of the final plan. (1) (4)

On March 3rd, Sunnyside, WA had a tank failure into waterways that effected both canals and animals near that location. Inclusion of these tanks needs to be considered to reduce staging time and maximizing containment should such failures occur. (7)

Response: Above Surface Tanks (ASTs) and Underground Storage Tanks (USTs) both present an oil spill risk in the planning area. Based on your comments, an overview of this risk has been added to Section 2.6 of the plan.

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

Comment: More work could be done on the areas in the Methods, Matrices or Staging Area planning part of the draft. That is, they are identified in the introduction but not included in the above. (1)

Response: The information and format of detailed response strategy information in Chapter 4 is consistent with that produced in similar plans throughout the state and in the Pacific Northwest. Staging area information is provided for locations where there isn't enough room to stage equipment on-site. Boat launch information is provided for

locations where a work boat larger than a hand-launch boat is needed to implement a response strategy. The plan intentionally focuses on staging areas and boat launch locations used in the deployment of response strategies; it's not a wholesale listing of every potential staging area and boat launch in the geographic area.

Comment: Incomplete information: Document only lists 2 boat launches in the Moses Lake area. It appears that there are at least 8 additional launches on the lake and recommend that the information on these be included in this section as well. (6)

Response: The plan focuses only on boat launch locations needed to support the deployment of GRP response strategies rather than a wholesale listing of every boat ramp in the geographic area. The two boat launches listed for Moses Lake directly support the deployment of nearby response strategies and, therefore, are included in the plan while others are intentionally left out.

Comment: Are there going to be any GRP response strategies developed for the East Low Canal? (5)

Response: No. The East Low Canal falls outside the planning area boundary so no GRP response strategies for the canal are provided in this plan.

Chapter 6 – Resources at Risk (Draft Plan):

Comment: I am particularly concerned about amphibians in the creek and lake if an oil spill happens. They are as vulnerable as birds, perhaps more so. Amphibians are very important in the ecosystem. What is known about oil spills on the macro and micro invertebrate communities in fresh water? How will oil impact the soils in and under the creek? (1)

Response: Ecology partners with Washington Department of Fish and Wildlife in the development of Section 6.2 (Natural Resources at Risk) which includes certain amphibians in the area; Columbia Spotted Frog [SC], Northern Leopard Frog [FCo/SE], and the Sagebrush Lizard [FCo/SC]. A discussion about oil spill impacts on macro and micro invertebrate communities in fresh water falls outside the scope of this plan. How oil might impact soils in and under the creek would depend on a multitude of factors including but not limited to the specific spill location, amount and type of oil spilled, time of year, creek/stream velocity, substrate type, and environmental conditions.

Comment: Incomplete information: Under "Sensitive Species", "Birds", insert "Sagebrush Sparrow [SC]" below "Peregrine Falcon [FCo/SS]". (6)

Response: Sagebrush Sparrow [SC] has been added to the list of sensitive bird species that may be present in this GRP planning area.

Comment: More work needs to be done on cultural sites. (1)

Response: Cultural sites/districts were considered in the development of this plan. Washington Department of Archeology and Historic Preservation (DAHP) shares information with Ecology about cultural sites/districts in Washington State. Tribal nations are invited to participate in the GRP update/development process and share information about other sites important to them. The specific location of culturally sensitive sites is known, but not advertised in this plan because there's a risk that others may injure, destroy, or illegally profit from knowing about such sites/districts.

Comment: We noticed that DOH ODW was included in the Spill Response Contact Sheet and also that Appendix 6A included a critical infrastructure table that includes Drinking water intakes. (3)

Response: Drinking water intakes in Moses Lake, Crab Creek, and tributary streams are considered an economic resource and should be listed in Appendix 6A (Economic Resources at Risk). Input from local governments and the people that live and work in the communities covered by the plan is needed in order for Appendix 6A to be adequately populated. Please send information about Economic Resources in your area to GRPs@ecy.wa.gov.

Comments: Drinking water systems may have other critical infrastructure besides intakes that could be damaged or contaminated by a spill. We did not find any mention of the water systems or a response strategy for spills that occur near water systems facilities or near ground water sources within the text of the document. (3)

The table resources in Appendix 6 should be completed before the plan is enacted. Livestock and rural wells could be negatively impacted based upon proximity to Crab Creek. (7)

Response: The primary method to prevent damage to drinking water systems after an oil spill occurs is to notify the owner/operator of such intakes and ask them to shut down pumps and close intake valves. Water intakes and ranney collectors that draw from Moses Lake and Crab Creek are a concern, especially where they are used in municipal water systems. Information about the precise location of such intake systems

in the area is valuable and, if provided, could be included in a future update to the plan (Appendix 6A - Economic Resources at Risk). Owner/operator names and contact information would also be needed. Please send information about such systems in your area to GRPs@ecy.wa.gov. Oil contamination of ground water including wells and facilities that don't directly draw water from Moses Lake, Crab Creek, or tributary streams falls outside the scope of this plan.

Comment: More work needs to be done on drinking water. (1)

Response: Drinking water intakes in Moses Lake and Crab Creek are considered an economic resource, and should be listed in Appendix 6A (Economic Resources at Risk). Input from local governments and the people that live and work in the communities covered by the plan is needed in order for Appendix 6A to be adequately populated. Please send information about Economic Resources in your area to GRPs@ecy.wa.gov.

Comment: Incomplete information: Recommend 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." (6)

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: Punctuation: Under item "10) Sylvan Lake:", 4th sentence. Remove comma at end of sentence. (6)

Response: The typographic error has been corrected.

Comment: Confusing information: 1st sentence. Reference to marine mammals makes no sense in the context of this GRP. Remove "…or marine mammal pupping areas" from this sentence. (6)

Response: Reference to marine mammal pupping areas has been removed from Section 6.5.1.

Comment: Incorrect word: 1st sentence. Replace the word "the" following "attempting" with the word "to". (6)

Response: The typographic error has been corrected.

Comment: Incomplete information: 3rd sentence. Insert "…of oiled wildlife…" after the word "…observations….". (6)

Response: The words "of oiled wildlife" have been added to the 3rd sentence of Section 6.5.3.

Chichester, Harry (ECY)

From: Laura Ackerman [lackerman@landscouncil.org]
Sent: Friday, April 03, 2015 4:47 PM
To: ECY RE Geographic Response Plans
Subject: Moses Lake response plan

3 April 2015

Dear DOE,

Thank you for the opportunity to comment on this plan. I can see that it was a lot of work to get all those photos and the data filled in. I am hopeful you will have a response from those listed at the end of the report that did not make comments.

Please include these comments into the official record.

Crab Creek as you know, is both biologically and historically important in central Washington State. I appreciate the attention to it. In a place like the Columbia Basin sagebrush steppe, it is iconic to a degree, especially if you grew up in central WA as I did. I am familiar with the area and with the creek.

More mention of the potential problems with the Yellowstone Pipeline needs to occur in the GRP. Many problems can occur with pipelines, and not detected for days. The state needs to know more about the volume, etc. of the oil coming through the pipeline.

More work could be done on the areas in the Methods, Matrices or Staging Area planning part of the draft. That is, they are identified in the introduction but not included in the above.

The BNSF line that runs 22 miles adjacent to the creek near Wilson Creek also needs to have more discussion of spill containment. That is potentially a disastrous situation if an oil train derails and explodes there. As DOE knows, oil train transportation has increased in WA state. It could increase more, depending on facilities built. And while it's likely that oil unit trains would probably not travel along this part of the BNSF line, it's a possibility in the future if there is complete build out for proposed facilities.

Thank you for noting that mixed cargo trains do often have oil tankers, likely Dot 111s or CPC 1232s, and that diesel is also carried in trains. A taker holds roughly 30,000 gallons of oil and just one tanker into Crab Creek could do a lot of damage.

An explosion and fire resulting from a derailment would be far worse for the contamination and clean up issue. If an explosion and fire happened it would just have to burn itself out. First responders don't have the capacity to put it out quickly. It would also take a few hours to get a command center into place, and this would increase the chances for contamination via more spillage. Can you give estimates for response times for spills?

Because making sure humans are safe in the event of a spill and fire, and rightly so, the environment will suffer more because it's not the first thing that is dealt with. That's why we need to put more emphasis on prevention of spills and leaks.

More work needs to be done on drinking water, and cultural sites.

I am particularly concerned about amphibians in the creek and lake if an oil spill happens. They are as vulnerable as birds, perhaps more so. Amphibians are very important in the ecosystem.

What is known about oil spills on the macro and micro invertebrate communities in fresh water? How will oil impact the soils in and under the creek?

Please also consider oil and fuel tanks leaking into the creek and lake, in the plan.

Again, thank you for your work on this important and often neglected part of the state. And please keep me updated.

Sincerely,

Laura Ackerman
Organizer and Oil Policy Director
The Lands Council
25 W. Main Ave. Ste. 222
Spokane, WA 99201
509 209-2404

Chichester, Harry (ECY)

From: dennis [rriver2b@hotmail.com]
Sent: Sunday, March 15, 2015 9:38 AM
To: ECY RE Geographic Response Plans
Subject: mosses lake-Crab creek response comments

Hi. Have only skimmed the draft document but have these initial comments.
You need to check with Ephrata BOR as there will be a new flow regime implemented in Crab Creek from Brooks lake to Mosses Lk. starting soon.
Your description of the area above Brooke lk IE from Wilson Cr. to Irby does not capture the several thousand acre peat system which was formally called Crab Lk. The railroad runs along and across this unique eastern WA. system. I mention this because I would assume response and clean up for a peat system is going to be different then for other areas of Crab Cr. and should be recognized and articulated in the plan.
Thanks
Dennis Beich

From: Hayes, Corina M (DOH)
Sent: Thursday, April 02, 2015 9:44 AM
To: ECY RE Geographic Response Plans
Cc: Burnham, Brad H (DOH)
Subject: Moses Lake/Crab Creek GRP

I am submitting these questions and comments are on behalf of the Department of Health Office of Drinking Water.

1. We noticed that DOH ODW was included in the Spill Response Contact Sheet and also that Appendix 6A included a critical infrastructure table that includes Drinking water intakes.
2. Drinking water systems may have other critical infrastructure besides intakes that could be damaged or contaminated by a spill.
3. We did not find any mention of the water systems or a response strategy for spills that occur near water systems facilities or near ground water sources within the text of the document.

We would be happy to help you draft language that includes information on how a spill would affect public water systems near Moses Lake or within the Crab Creek area.

Corina

Corina Hayes, Source Water Protection Manager
Washington State Department of Health
Office of Drinking Water
Phone: (360)-236-3114 Email : corina.hayes@doh.wa.gov
243 Israel Road S.E., Tumwater 98501 or PO Box 47822 (MS: 47822)
Olympia, WA 98504
Web site: <www.doh.wa.gov/ehp/dw>

-- Public Health: Always Working for a Safer and Healthier Washington --

From: Ken Mattson [mailto:kenm@alphasalestech.com]
Sent: Wednesday, March 11, 2015 10:09 AM
To: Isakson, Lisa (ECY); SPILLS-PROGRAM@LISTSERV.WA.GOV; Hawkins, Brad
Cc: ECY RE Geographic Response Plans; 'Chris Herron'
Subject: Public comments accepted for Moses Lake/Crab Creek GRP

Spill Prevention, Preparedness, and Response
Hi Lisa

In the recent Sulphur Creek Spill
http://www.ecy.wa.gov/programs/spills/incidents/SulphurCreekSpill/index.html

An above ground tank without the required secondary containment (EPA's Spill Prevention Contain Countermeasure Plan) caused this spill. There are farms and tanks along this Moses Lake/Crab Creek Geographic Response Plan that will effect this GRP.

The EPA enforcement for SPCC plans and secondary containment is not that active and I have been told by Ecology that you are looking to Fire Marshals for regulation and inspections.

I suggest that in order to prevent spills, that secondary containment for above ground tanks have a plan for enforcement.

Sincerely

Kenneth Mattson, Office 877-400-5260 cell 509-679-9659 SPCC Consultant, Wenatchee, WA

From: Kuntz, Michael R
Sent: Monday, March 09, 2015 7:05 AM
To: Zimmerman, Scott (ECY)
Cc: Church, Christopher W; Devries, Brett A
Subject: RE: Draft Moses Lake/Crab Creek GRP is Now Available for Your Review & Comment

Scott thanks for letting us review the GRPs . These comments are from my review, Chris and Brett may have more comments,

1. Please list Yellowstone Pipe Line Co on Page 4 Spill Contact Sheet 1-877-267-2290.
2. Are there going to be any GRPs for East Low Canal?

Thanks
Mike Kuntz
Yellowstone Pipeline Co.

From: Macdonald, Brian F (DFW)
Sent: Thursday, April 02, 2015 3:36 PM
To: ECY RE Geographic Response Plans
Cc: Chichester, Harry (ECY); Carlson, Andy (DFW)
Subject: Moses Lake/Crab Creek GRP Review Comments

Attached please find our comments on the MLCC GRP draft, currently out for public review. In general, we found the document to be well crafted and I believe that you will find our comments to all be relatively minor in nature.
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

Item	Section	Page	Issue	Recommendation
1	Contacts	ii	Incomplete information	Under "-Other Contact Numbers-", "Dept. of Fish and Wildlife", insert new bullet at top of list and insert "Oil Spill Team (360) 534-8233*"
2	4D-2	192	Incomplete information	Document only lists 2 boat launches in the Moses Lake area. It appears that there are at least 8 additional launches on the lake and recommend that the information on these be included in this section as well.
3	6-2	200	Incomplete information	Under "Sensitive Species", "Birds", insert "Sagebrush Sparrow [SC]" below "Peregrine Falcon [FCo/SS]".
4	6.2.2b	204	Punctuation	Under item "10) Sylvan Lake:", 4th sentence. Remove comma at end of sentence.
5	6.5.1	208	Confusing information	1st sentence. Reference to marine mammals makes no sense in the context of this GRP. Remove "…or marine mammal pupping areas" from this sentence.
6	6.5.3	208	Incorrect word	1st sentence. Replace the word "the" following "attempting" with the word "to".
7	6.5.3	208	Incomplete information	3rd sentence. Insert "…of oiled wildlife…" after the word "…**observations**….".

	New	208	Incomplete information	Recommend 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."

Comment from Eric McConnell on March 31, 2015 from RRT10/NWAC Comment System

The Crab Creek/Moses Lake GRP is adequate for a coordinated response to a catastrophic spill at intersections of the area's roads or rail lines and the listed waterways. The methods described appear satisfactory for containment. Yet, there are areas that are identified in the draft introduction that have not been included in the response Methods, Matrices, or Staging Area planning. First, the Yellowstone Pipeline has been excluded from the draft entirely, with exception to Section 2.6. The volume of petroleum transported through the pipeline within this region should be included due to the high impact of any pipeline failure. Second issue, is related to the BNSF rail line that runs adjacent to Crab Creek for approximately 22 miles from Odessa, WA to Wilson Creek, WA. The bridge crossings have, in part, been identified in the draft. Yet, the draft does not address containment of spills along this adjacent passage of oil transport to Crab Creek. Access to the creek is more remote due to limited roads and the potential for spill is higher due to the proximity to the creek, topography, increasing number of oil loaded trains, and the parallel passage of these trains to the drainage. Last, is consideration of oil/fuel tanks near or potentially leaking into the drainage. On March 3rd, Sunnyside, WA had a tank failure into waterways that effected both canals and animals near that location. Inclusion of these tanks needs to be considered to reduce staging time and maximizing containment should such failures occur. The table resources in Appendix 6 should be completed before the plan is enacted. Livestock and rural wells could be negatively impacted based upon proximity to Crab Creek. Also ignition/explosion of an oil spill is not mentioned at any point in the draft. If this is encompassed in the NW Contingency Plan, then it might be beneficial to indicate such links in the draft. Thank you, Eric McConnell