

RESPONSE TO COMMENTS

Outer Coast Geographic Response Plan Update

Received through March 28, 2008

Comments on the February 2008 draft of Chapter 4 for the GRP were contributed by: (1) Ed Bowen, a resident from Ozette; (2) Tammy Brown representing U.S. Navy; (3) Craig Cornell representing Marine Spill Response Corporation; (4) Jennifer Hagan representing the Northwest Indian Fisheries Commission; (5) Liam Antrim representing Olympic Coast National Marine Sanctuary; (6) Warren Scarlett representing the Hoh Tribe; and (7) John C. Richmond, resident of the Hoh River valley.

We wish to sincerely thank all contributors for their time and expertise in providing the comments below. Their contributions have significantly improved the revised Outer Coast and Strait of Juan de Fuca marine Geographic Response Plans (GRP).

The Washington Department of Ecology, United States Coast Guard and Washington Department of Fish and Wildlife reviewed all comments/recommendations.

Ecology categorized and condensed the original comments to make them more clear and consistent within this comprehensive comment/response format. For each comment, the contributor is acknowledged by number (above), followed by our response. Some contributors submitted combined comments that applied to both the Strait and Outer Coast GRPs—those comments are included in the Strait's summary rather than this one.

General comments concerning GRP approach, data source(s) or format.

Comment: The GRP warns us about the Olympic Coast National Marine Sanctuary (OCNMS), but is OCNMS shown on the map anywhere? (2)

Response: No, OCNMS is not on the map for that area. At this time, it is not possible to add it due to data limitations of the automatically generated mapping system. Keep in mind that the maps in Chapter 4 are not meant to serve as comprehensive charts, or used for navigation - they are designed to be simple. Note that in an actual spill, OCNMS would likely be part of the Incident Command and could make advisements accordingly, and responders would have access to a GIS layer with the OCNMS boundaries for use in the command center.

Comment: OC-26 the Quinault numbers are missing. (2)

Response: They are now added.

Comment: The conditional priority categories are a valuable, user-friendly, good addition. (2, 3, 4) Direction system too. (2)

Response: One of the lessons from recent large events is that responders may be from outside the area; the detailed driving directions are an attempt to improve the response ability for 'non-locals.'

Comment: Some of the key personnel contact information should be verified and updated every 6 months; for example: Hoh contact information should also include Walter Ward, Wildlife Enforcement, who is on site 24/7 at: 360-374 3270 cell: 360-640-9134. In addition, contacts for Hoh Tribe are through the Forks dispatch (374-2223) and BIA Enforcement 374-6092 (all whom are located in Forks). (4)

Response: We will attempt to keep all the information current. The new data system should make the management of such data and the release of updates easier and timelier. When significant changes are made, we alert the response community and they are then responsible for downloading the latest version. The information you provided will be included in the final release for the OC GRP.

Comment: *There will be circumstances where the stream gauges would be useful (crossing rivers) and a link to their respective sites could be useful.*

(<http://waterdata.usgs.gov/wa/nwis/>) (4)

Response: Good idea, this tool is available and used now by the response community..

Comment: *Data from the annual beach clean up could be useful in identifying collection areas along the coast.* (4)

Response: Good idea, can you provide this data, or provide a contact person with whom we can check?

Comment: *The lack of Environmental Sensitivity Indices is of concern (Shoreline ratings, Biological Resource, Human Use Resource). Does Ecology plan on incorporating this information in a different chapter? The lessons learned from the San Francisco spill last year highlighted the importance of having sensitive sites identified in the planning stages and not at the time of response. In addition, a tiered approach that assists in prioritization of these areas would be useful. My concern is that given the correct circumstances an option may be to protect for example: smelt spawning sites that are not in the rivers or estuaries.* (4)

Response: Please keep in mind that the purpose of Chapter 4 is to provide only general boom strategy information to field responders prior to the establishment of a command center or knowledge of detailed information on the nature of the spill. If a spill occurs, the environmental unit and NOAA SSC has the ESI information and more. This information and other factors would be used by Unified Command to refine the response.

Comment: *The GRP for the Straits of Juan de Fuca contains information on some of the marine resources on the outer coast and identifies potential sensitive areas for razor clams, smelt, crab, rockfish, and sand lance. Lacking any other data, perhaps this can be utilized? (Washington Department of Fisheries Technical Report 79 1992 70 pages-note pages35, 52, 64, 65, table 3.).* (4)

Response: Please keep in mind that the purpose of Chapter 4 is to just provide general boom strategy information to field responders prior to the establishment of a command center or knowledge of detail information on the nature of the spill. If a spill occurs, the environmental unit and NOAA SSC has the access to environmental data. This information and other factors would be used by Unified Command to refine the response.

Comment: *Capitalize Outer Coast in first paragraph, and consider global search and replace when used as a place name. Following "Notice:" replace "through" with "over" and add phrase to read "flights over the Olympic Coast National Marine Sanctuary within one mile of the shore or islands."* (5)

Response: These adjustments have been made.

Comment: *Delete "Rapid and" leave "Extreme tidal changes". Tidal changes are not particularly rapid off the Outer Coast. Close first sentence with "know the tidal state and predicted tidal changes." Edit text to read "Be wary of wet logs, unstable ground, and slick footing on trails..." One does not need to be wary of the trails per se.* (5)

Response: These adjustments have been made.

Comment: *Page 4-3. Begin with introductory text e.g., "Priority tables identify the order or priority in which strategies are deployed for a given area." The fundamental reason long-term, predictive models were not used for the Outer Coast is more accurately stated as*

"Surface water movements on the Outer Coast are dynamic and primarily wind driven, and the area is not subject to same tidal circulation patterns that dominate waters of Puget Sound."
(5)

Response: This entire page was removed in the final draft.

Comment: *Page 4-4. As written, the value of "Has initial control and containment been sufficiently achieved?" is questionable because it is assumed to always be priority #1. It could be rephrased as something like "Is there adequate staff devoted to control and containment efforts?" The large font statement at the bottom re: strategies numbered north to south is redundant with one immediately following on page 4-5.* (5)

Response: No changes made, because we wish to underscore these points, not 'assume' that they are understood.

Comment: *Prioritize OC-19 below OC-18 because oil is very unlikely to reach far up Kalaloch Creek, so downstream strategies should be attempted first. OC-19 should have low priority in this OC-C group and not be ranked high just because it is AUTO.* (5)

Response: No change made. While it is true that OC-19 is further upstream, the strategy can be put in quickly under a wide range of conditions. Thus, we want to get this boom in place first and then proceed to any more difficult and labor-intensive strategy further downstream.

Comment: *Maps beginning on page 4-15 need more location information; e.g., rivers and towns should be identified.* (5)

Response: No change made. The maps have the information the response community has asked for in the GRP. They are not meant to be used for navigation, but are provided for a general graphical representation of an area and the associated strategies. If too many layers of information are included they become too cluttered to be of use to responders.

Comment: *The phrase "Only accessible by helo." could be added to OC-12 and others under Implementation.* (5)

Response: This was done for those sites we were unable to get to by land during our field work.

Comment: *Grouping of booming priorities by hypothetical spill origin points serves to create a subset of strategies without any specific rationale. However, the logistics of spill response are probably most effectively organized around staging areas. Consider that Tables 4-1 through 4-5 might be better organized around staging areas rather than spill point of origin.*

Response: No change made. The GRPs are part of the NWAP, as such the format and content is standardized. The concept you have proposed is addressed by the use of the 'STAGE' category for appropriate sites.

Comment: *The gravelly reefs at Ozette and north of the mouth of the Hoh River are abundant with hardshell clams and especially vulnerable. The sandy beaches, between Ruby Beach and the mouth of the Queets River, and in the vicinity of Latitude 47°27' have yielded a continuing source for razor clams for both tribal and non-tribal harvests.* (7)

Response: Shellfish have been added as a resource for these areas.

Specific comments concerning booming.

Comment: *OC-9: Consider using 300' boom instead of 500'* (3)

Response: No change made, the longer run of boom will allow responders to use a smaller angle, which should be helpful given the currents in this area. Of course, the responders are always able to adjust the strategy based on real-time conditions.

Specific comments concerning directions.

Comment: *OC-1 thru OC-6: All list closest address in Sekiu instead of Neah Bay. Others also have odd addresses, e.g., Forks for OC-9.* (3, 5)

Response: The "odd" addresses are based on GNIS (Geographic Naming Information System) data, we do not believe that Neah Bay is included in that data set but Sekiu is.

Specific comments concerning spelling or grammar.

Comment: *OC-10 and 11 state "USCG USCG". (2)*

Response: Fixed.

Comment: *OC-18: "Angel" should be spelled "angle" in Strategy implementation. (3,5)*

Response: Fixed.

Specific comments concerning access, naming or ownership.

Comment: *The Pac Beach Navy area on the OC-13 map is usually called the Pacific Beach Resort and Conference Center. (2)*

Response: Geographic names/titles are based on the latest GIS data the state has.

Comment: *Some potential access points that have been left off--areas where ATV and/trucks would likely be able to get within a 1.0 mile of the beach for transportation of personnel (helicopters can drop the gear on the beach)--include Goodman, Mosquito, Scots, and Jackson Creeks. Contact Rayonier Northwest Forest Resources at 360-374-6565 for a copy of their "Recreation Guide for Clallam and Jefferson Counties". The attached RayonierMap.pdf is a section of that 1997 map. (4)*

Response: These types of access would require a local guide. In such situations we include contact information but do not include driving directions in the GRP.

Specific comments concerning changing strategies, access, spill origin points, and so on.

Comment: *At this time I object to approval of the "conditional categories: AUTO, CALL & RECON" concept. My objection is for the most part due to the lack of discussion at the local community; the perception is this was created and decided on at the 40,000 foot level and did not factor in the ideas and needs of the local community. Why, what, where, who, when, how is not at the community level. Please don't accept this concept at this point in time. If you do, then the realistic use of the GRP as a spill response plan the community can rely on has to change from what its current purpose is being advertised to my community. Bottom line, my area of the coast, the north coast has a low level of expectation as to how the different agencies will respond in a spill situation. Please work to solve what the expectation should be, at least in our eyes. Thank you. (1)*

Response: Please note that the above comment and many of the comments below refer to one or more of the three conditional categories (AUTO, CALL, & RECON), that were recommended in the final GRP review/draft phase. Because a condition-dependent approach is new (and highly appropriate) one for the response community to implement, we made sure that they were supportive of this change (see comments from sources 2,3, and 4). In addition, the Northwest Area Committee's GRP Workgroup reviewed the categories, and following extensive discussions with the Workgroup, the NWAC Steering Committee resolved to adopt a system that uses *two* conditional strategies, "CALL" and "STAGE." Accordingly, our responses to comments that refer to the older, three categories, are framed to reflect the new, two-category system.

That system is as follows:

For cases where the area is dynamic and remote, the label "CALL" has been included in the priority table as well as the matrix. Response personnel should call a pre-approved local contact person to obtain real-time information about the prevailing environmental conditions, while equipment is dispatched to the strategy site.

For cases where the access to the area is extremely difficult, the label "STAGE" has been included in the priority table as well as the matrix. Response personnel should assemble response equipment at the nearest pre-determined staging area and wait for further instructions. Once the situation is assessed, priorities and direction will be relayed to response personnel.

Comment: *The staging area for Whale Creek (OC-25-RECON) would probably be best if it was Kalaloch or Taholah instead of Forks as listed. (4)*

Response: The staging area for these have been changed to South Beach as it helo accessible. We believe that options for deploying personnel and equipment are better served by this area.

Comment: *It is curious that there is no point of origin for a spill off Cape Flattery (Maps OC-1 and OC-2) where the probability of an oil release is probably highest. If STR-A (from Strait of Juan de Fuca GRP) is considered the northern most point of origin for spills relevant to maps OC-1 and OC-2, then insert a note to this effect. [See miscellaneous comment #1 below - it may not matter what the point of origin locations are because these seem to be used only for strategy groupings, and some strategies are duplicated in Tables 4-1 through 4-5. If there is a significant influence on planning and response provided by the point of origin (this is not clear in the GRP), then a point of origin should be located near Cape Flattery.] (5)*

Response: As the Outer Coast strategy sequence for a spill at Cape Flattery or Cape Alava is the same, we just use the Cape Alava point for the entire northern area.

Comment: *The table on Page 4-68 should include Neah Bay boat launches (BL-162, 163, 166) because these are most appropriate for anywhere north of Cape Alava. (5)*

Response: While the overview map does show these launches that are outside the area - the detailed table information is only for the OC area. As the response community would have access to all the GRPs this will not present a hardship for them.

Comment: *Most boat launches identified are for lake or river access only. If the GRP addresses spills in freshwater, this is appropriate; if not, then the freshwater boat launches are not relevant. (5)*

Response: The response community asked that we show all boat launches for a given area.

Comment: *Smaller boats can be launched in the mouths of the Hoh and Quinault rivers and under fair conditions driven over the bars into the ocean. Also, if fresh water launch sites are included (see #2 above), then launches on these rivers should be identified. (5)*

Response: The data source for the boat launch layer is from another agency. Launches on Tribal lands would require a tribal guide, so in the event of a spill responders would rely on such local knowledge.

Comment: *(a) The strategies at the Quillayute River are questionable. Why not put river boom across entire river? (b) Why are these strategies not designated AUTO? (5)*

Response: (a) It is not practical to put boom across the entire river. The best that can be done is to work with the currents and flow to assist the collection of oil. The strategies were developed based on over 40 years of field experience with oil spills and booming techniques. (b) The mouth of the Quillayute River is extremely dynamic, so CALL is now the appropriate designation.

Comment: *The chevron at Chalaat Cr. (OC-17) is likely too far upstream by several hundred yards. (6)*

Response: Fixed.

Specific recommendations for conditional status reclassifications.

Comment: *We recommend application of AUTO priority for OC-5, 6, 9, 10, 11 (5).*

Response: These areas are extremely dynamic so CALL is now the selected designation.

Comment: *We recommend OC-21 through 24 all be RECON because no one lives near the mouth of the river. Who can be contacted? Again, OC-19 should have low priority.* (5)

Response: We have contacts with the Quinault Nation who can provide information.

Comment: *(a) OC-37 and 38 are far upriver where oil unlikely to reach, so priorities for these strategies should be lowered in the OC-E group even if they are AUTO. (b) We question why OC-36 is AUTO when comparable ones are all CALL or RECON.* (5)

Response: (a) Field experience has taught us that often it is best to get the upstream strategy in and then work down stream. (b) Wreck creek is not logistically difficult or labor-intensive so it was categorized accordingly.

Comment: *Many but not all strategies on tribal lands are CALL. If this is a policy, then it should be consistent (OC-1 through 3 and 36 may be the exceptions).* (5)

Response: All strategies on tribal lands state that tribal guides are required and we therefore provide contact information. "CALL" is now the selected status for those strategies.

Comment: *It seems like one strategy at the larger rivers (e.g., Quinault, Sooes) should be AUTO with others being CALL or RECON. In other words, send folks out expecting to deploy boom and let them decide on-site where it would work best, based on real-time assessment.* (5)

Response: The "CALL" category now covers the set of conditions you described.

New strategies submitted/recommended.

Comment: *Strategy across the mouth of the Sooes, similar to OC-2 at the Waatch. It is not a particularly high flow river, and there is significant marsh and mudflat habitat to protect. This should be a higher priority than other strategies employed further upcurrent.* (5)

Response: Test field deployments have proved that it is not possible to successfully put and hold boom across the mouth of the Sooes.

Oral comment/question of Michael F. Adams, chair of Jefferson County MRC, during GRP Workshop in Port Angeles, March 1, 2007.

Comment: *What can GRPs do to protect or help denote shellfish areas?*

Response:

If an effective strategy can be developed for a shellfish resource, we do so and include it in Chapter 4 of the GRP for that area. If we cannot develop a strategy, we can list the site in a statewide 'Economic Resource' list. Site factors that can make booming impractical include:

- Extremely shallow mudflats that can make it difficult to deploy boom or adjust it after it has been deployed.
- Open shorelines that are exposed to winds, tidal forces or currents that reduce the effectiveness of boom.
- Large expanses that cannot realistically be spanned by boom because of the physical forces acting on the boom.

In addition to commercial shellfish beds, this statewide Economic GRP chapter can include other economic resources that have been submitted for evaluation—for example, marinas, net pens, tourist beaches, etc.

For each site in the Economic Resource list, we can provide information regarding location, targeted resources, and other facts that could be useful to the command center on the day of the spill.

Question: *Are GRPs the only response strategies that would be implemented during an oil spill?*

Answer: The strategies included in the GRPs do not represent everything that could, would or should be done during a spill. They are a collection of initial booming strategies for a given area that should reduce some of the impacts from a spill in that area. There are many other response options which would be used (for example initial containment of the spill and on-water recovery) during a spill.