RESPONSE TO COMMENTS

Spokane River Geographic Response Plan Update

Received through July 22, 2011

Comments were contributed by: (1) Dave Ayres, Avista Utilities; (2) Kim Ashmore, City of Centralia; (3) June Bergquist, Idaho Department of Environmental Quality; (4) Earl Liverman, U. S. Environmental Protection Agency; (5) Andy Carlson, Washington Department of Fish and Wildlife.

We wish to thank all contributors for the time and effort they provided in developing and submitting the comments below. We greatly appreciate the advice and recommendations offered by each contributor, and made significant changes to the draft plan because of their involvement.

The Washington Department of Ecology and U. S. Environmental Protection Agency (Region 10) reviewed all comments and recommendations. Ecology categorized and condensed the original comments about the draft Spokane River GRP to make them more clear and consistent within the framework of this document's comprehensive comment/response format. For each comment, the contributor is acknowledged by number (above), followed by our response.

General Comments:

Comment: Where in the plan can I find information on where oil containment boom and other response equipment are stored? Local agencies that follow this plan need to know where this equipment is located. (2)

Response: Response Equipment Cache Locations are included in Chapter 7 (Logistics). Response resource information can also be found on the Western Response Resource List (WRRL); an on-line oil spill response equipment database maintained by regional equipment owners including Washington State approved Primary Response Contractors. Response equipment locations nearest Centralia include Longview and Olympia.

Comment: A note should be provided at the beginning of the document that explains what pages need to be printed in landscape and portrait orientation, especially since pages are laid out differently throughout the document. (3)

Response: A note regarding the printing of the Spokane River GRP has been placed in the forward part of the plan, immediately following the Spill Response Contact Sheet. A similar note has been provided in Chapter 4 before the Table of Contents, since it is conceivable that it may be printed as a standalone document, independent of the other chapters.

Contact Information Comments:

Comment: The contact numbers for the Idaho Department of Environmental Quality (Coeur d'Alene), Idaho Department of Fish & Game (Panhandle Region), Idaho Transportation Department (District 1), and Kootenai County need to be added or updated on the Spill Response Contact Sheet. (3)

Response: Telephone numbers for Idaho Department of Environmental Quality (Coeur d'Alene), Idaho Department of Fish & Game (Panhandle Region), Idaho Transportation Department (District 1), and Kootenai County have been updated and/or added to the Spill Response Contact Sheet

Comment: Section 4.1.1 of Chapter 4 should have contact information for the Kootenai County Sherriff and City of Post Falls. (3)

Response: Contact information for the Kootenai County Sherriff and City of Post Falls has been added to Section 4.1.1.

Comments about Chapter 4 – Response Strategies & Priorities

Comment: The Water Speed Drift Measurement Table, Historic Streamflow for Spokane River and Tributaries Table, and Historic Streamflow for Spokane River and Tributaries Figure are useful but they should be grouped together in Chapter 4, or repeated if kept in different locations. (3)

Response: The Water Speed Drift Measurement Table, Historic Streamflow for Spokane River and Tributaries Table, and Historic Streamflow for Spokane River and Tributaries Figure have been relocated to Section 4.1 of Chapter 4; they now reside together on pages 4-4 through 4-6.

Comment: Chapter 4 of the draft plan shows a "Spill Origin Point" at the state line and the nearest strategy location miles upstream at Corbin Park (SPR 99.5). Shouldn't there be a Spill Origin Point upstream from Corbin Park? (3)

Response: A Spill Origin Point has been added to the eastern most extent of the GRP coverage area, on the Spokane River above Post Falls Dam. This spill origin point may represent spills further upstream, outside the geographic boundary of the Spokane River GRP, or spills on Coeur d'Alene Lake that threaten to migrate down the Spokane River.

Comment: The Highway 95 crossing of the Spokane River in Coeur d'Alene should be a Potential Spill Origin Point. Boom deployment strategies should be identified at several locations above the Post Falls Dam including the public launch facilities, the Village at Riverstone, and Harbor Island. (4)

Response: A Spill Origin Point has been added to the eastern most extent of the GRP coverage area, on the Spokane River above Post Falls Dam, approximately 5.0 miles downstream from the Highway 95 crossing of the Spokane River in Coeur d'Alene. This spill origin point may represent spills further upstream, outside the geographic boundary of the Spokane River GRP, or spills on Coeur d'Alene Lake that threaten to migrate down the Spokane River. Field work and site evaluations should be completed to determine the viability of other response strategy locations above Post Falls Dam.

Comments about Chapter 4 (continued)

Comment: Use the Little Falls Dam standard operating procedures for "Large Third-Party Oil Release on Spokane River" in the "Communication Process & Action" section of strategy SPR 29.0-N in Chapter 4. (1)

Response: Avista's SOP for Little Falls Dam concerning "Large Third-Party Oil Release on Spokane River" has been incorporated into in the "Communication Process & Action" section of strategy SPR 29.0-N of Appendix 4A of Chapter 4.

Comment: In Chapter 4, use the DNR "Lake Spokane Campground" for SPR 34.0 staging rather than staging equipment behind Crescent Dam Wall. There is no easy way to get boom or other response equipment up onto Long Lake from behind the Crescent Dam Wall; it's too steep. (1)

Response: Reference to staging response equipment behind the Crescent Wall Dam at Long Lake Dam in Strategy SPR 34.0 of Appendix 4A, and related matrices in Chapter 4, has been removed and replaced with staging at the DNR "Lake Spokane Campground" (SA-SPR 38.1).

Comment: In Chapter 4, use the DNR "Lake Spokane Campground" for SPR 34.0 staging and boat launch, rather than Browns Landing (aka Avista Boat Launch). Access to Browns Landing is very steep and limited. (1)

Response: Reference to staging and boat launch at Avista Boat Launch/Browns Landing in Strategy SPR 34.0 of Appendix 4A, and related matrices in Chapter 4, has been removed and replaced with staging and boat launch at the DNR "Lake Spokane Campground" (SA-SPR 38.1 and BL-SPR 38.1).

Comment: Use the Long Lake Dam standard operating procedures for "Large Third-Party Oil Release on Spokane River" in the "Communication Process & Action" section of strategy SPR 34.0-N in Chapter 4. (1)

Response: Avista's SOP for Long Lake Dam concerning "Large Third-Party Oil Release on Spokane River" has been incorporated into in the "Communication Process & Action" section of strategy SPR 34.0-N of Appendix 4A of Chapter 4.

Comment: Use the Nine Mile Dam standard operating procedures for "Large Third-Party Oil Release on Spokane River" in the "Communication Process & Action" section of strategy SPR 58.0-N in Chapter 4. (1)

Response: Avista's SOP for Nine Mile Dam concerning "Large Third-Party Oil Release on Spokane River" has been incorporated into in the "Communication Process & Action" section of strategy SPR 58.0-N of Appendix 4A of Chapter 4.

Comment: Use the Upper Falls & Monroe Street standard operating procedures for "Large Third-Party Oil Release on Spokane River" in the "Communication Process & Action" section of strategies SPR 74.0-N and SPR 74.5-N in Chapter 4. (1)

Response: Avista's SOP for the Upper Falls & Monroe Street Dams concerning "Large Third-Party Oil Release on Spokane River" has been incorporated into the "Communication Process & Action" section of strategies SPR 74.0-N and SPR 74.5-N in Appendix 4A of Chapter 4.

Comments about Chapter 4 (continued)

Comment: In Chapter 4, strategy SPR 99.5 (Corbin Park) states, "River speed and conditions may warrant use of shorter sections of boom rather than longer lengths." It would be helpful to graphically add to the photo, a deployment strategy that uses shorter sections of boom. (3)

Response: Consistent with the representation of containment boom in other response strategies in Appendix 4A of Chapter 4, the depiction of shorter boom lengths on strategy diagrams, including SPR 99.5 (Corbin Park), was purposely removed because the number and length of boom, and the anchor points for each segment, vary greatly depending on river speed and on scene environmental conditions. Spill response contractors and emergency personnel need to be reminded that shorter lengths of boom may be needed at particular strategy locations, but the length and number required to actually implement a strategy on any given day and the exact anchoring points of shorter boom segments in the river, must be left to the responder's best professional judgment and experience.

Comment: In Chapter 4, strategy SPR 99.5 should note that the access road to the Corbin Park boat ramp may be closed certain times of the winter due to icy conditions. The City can open up the road for emergency responders. (3)

Response: A note about the possible closure of the access road to the Corbin Park boat ramp in icy conditions has been added to SPR 99.5 in Appendix 4A of Chapter 4.

Comment: In Chapter 4, remove Boat Launch BL-SPR 34.8 and replace it with the Boat Launch at the DNR Lake Spokane Campground. Update all related reference maps and matrices, as appropriate. (1)

Response: Boat Launch BL-SPR 34.8 in Chapter 4 has been removed and replaced with the boat launch at the DNR Lake Spokane Campground (BL-SPR 38.1). All related reference maps and matrices have been updated to reflect this change.

Comment: Include the Blackwell Island, Greensferry, and Q'emlin public launch facilities as Boat Launch Locations in Chapter 4. As appropriate, include these facilities as staging areas also. (4)

Response: Greensferry and Q'emlin Park have been included as Boat Launch Locations. Q'emlin Park has also been included as a staging area above Post Falls Dam. Blackwell Island is outside of the eastern most extent of the GRP boundary and, therefore, is not included as a staging area or boat launch location in the Spokane River GRP.

Comments about Chapter 5 – Shoreline Countermeasures

Comment: In Chapter 5, there should be a label identifying shoreline types on each "Shoreline Countermeasures Matrix" (pp. 5-11 to 5-14) so the numbers are not mistaken for similarly numbered geographic regions. (3)

Response: A label with an arrow indicating "shoreline type" has been added to the Shoreline Countermeasure Matrices in Chapter 5.

Comments about Chapter 6 – Resources at Risk

Comment: It should be assumed that individual waterfront properties below Post Falls Dam use river and lake water for drinking. Therefore, the area from Post Falls Dam to the Idaho/Washington state line should be added to Appendix 6A of Chapter 6 as "Critical Infrastructure - Drinking Water Intakes." (3)

Response: Drinking Water Intakes for Individual Waterfront Properties from the Post Falls Dam to the Idaho/Washington state line has been added as an Economic Resource at Risk in Section 6.1 of Appendix 6A.

Comment: The recreational use of the lower portion of the Spokane River in Idaho is a very popular past time during the summer months. Therefore, under heading C1 "Boating Areas" in Appendix 6A of Chapter 6, add "Floating the Spokane River." It extends from Corbin Park in Post Falls to the Idaho/Washington state line. (3)

Response: "Floating the Spokane River" (Corbin Park to the Idaho/Washington state line) has been added as a Water Dependent Recreational Area in Section C1 of Appendix 6A.

Comments about Chapter 7 – Logistics

Comment: Kootenai Environmental Alliance should be added to the list of "Environmental and Conservation Groups" in Chapter 7. This group has been active in the Coeur d'Alene basin since 1972 to conserve, protect and restore the environment with particular emphasis on the Idaho Panhandle and the Coeur d'Alene Basin which includes the Spokane River. (3)

Response: Kootenai Environmental Alliance has been added to the list of Environmental & Conservation Groups in Chapter 7 (Logistics)

Comment: Wiley E. Waters Whitewater Rafting in Post Falls should be added to the list of "River Guides" in Chapter 7. They provide guided river trips along portions of the Spokane River from Liberty Lake downstream as far as Riverside State Park. (3)

Response: Wiley E. Waters Whitewater Rafting (Post Falls) has been added to the list of River Guides in Chapter 7 (Logistics)

Comment: Information on response equipment cache locations in Coeur d'Alene should be added to Chapter 7. Include equipment held by Kootenai County Fire and Rescue Station 4, and Idaho Department of Lands in the list of Response Equipment Cache Locations. (3)

Response: Response equipment in Coeur d'Alene has been added to Chapter 7 (Logistics). Equipment held by Kootenai County Fire and Rescue Station 4 and Idaho Department of Lands is now included on the list of "Response Equipment Cache Locations."

Comment: In Chapter 7, "Wildlife Rehab Facilities & Cleaning" should be removed and listings for Wildlife Response Contractors, Wildlife Equipment Owners, and Potential Mobile Wildlife Rehabilitation Equipment Deployment Locations added. (5)

Comments about Chapter 7 (continued)

Response: "Wildlife Rehab Facilities" in Chapter 7 (Logistics) has been removed and replaced with a listing for "Wildlife Equipment Owners" and a listing for "Wildlife Response Contractors." A listing for "Potential Mobile Wildlife Rehabilitation Equipment Deployment Locations" was not included in the chapter.