

# Columbia Basin Railroad

Columbia Basin Railroad (CBRW) is in compliance with the previous interpretation of this law and continues to work with the DOE regarding implementing the latest iteration.

CBRW's concern is that additional SMT and Wildlife Response Contractor's written commitment will not be achievable without an actual contract with such providers. Much the same as the Letter of Intent for a PRC was intended not to require a retainer or contract; when in fact no PRC would commit without a contract.

The additional ICS positions and alternates to fulfill the response team has been increased from 16 positions (which CBRW has filled) to 29 Positions. This in effect will force CBRW to use a 3rd party SMT. The NWACP does not even suggest this level of coverage. There is an option to list people twice, but how does this increase preparedness? We suggest leaving the original 16 person roster as this seems more than sufficient.