



Snohomish County

Marine Resources Committee

Dec 9, 2020

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Wendy Buffett
Department of Ecology
Spills Program
PO Box 47600
Olympia, WA 98504-7600

RE: Central Puget Sound GRP Update

Dear Ms. Buffett and Department of Ecology Spills Program:

The members of the Snohomish County Marine Resources Committee (MRC) would like to offer comments regarding the 2020 update to the Central Puget Sound Geographic Response Plan (CPS GRP). The Snohomish MRC is a broad-based citizen's advisory group appointed by the County Council, and is made up of economic, environmental, tribal, and conservation interests. Over the past 20 years, our team of citizen volunteers have been dedicated to promoting effective stewardship of Snohomish County's nearshore waters, habitats, species, and shorelines. The members continually seek out the best available scientific information to help manage and protect natural resources for the benefit of all within our county and the Puget Sound region.

The goals of the following comments are to help ensure that the best available knowledge, information, practices, and plans are in place in the event of an oil spill.

Our main general comments are:

- **Updating GRPs** is a critical, pro-active step in oil spill preparedness and response.
- **Changing the format of the GRP** to a web-based one with downloadable sections and embedded links is an excellent step. It substantially increases the utility of the document, and facilitates a more effective, timely response, when implementation of the plan is necessary.
- **We strongly recommend repeated cross-references to adjacent GRPs**, when applicable, given the hydrologic connectivity of the region, the widespread distribution and mobility of the area's sensitive natural resources, and the significant importance of the local cultural and economic resources.

Our section-specific comments/revisions are below. Please note the entire GRP document was not reviewed, and the following comments are provided only for the region of the planning area that occur within Snohomish County.

SITE DESCRIPTION section –

PHYSICAL FEATURES

- **Manmade features**, including docks, wharves, *piers*, *riprap* and *other hard armoring*, waterways, and marinas, also occupy much of the shoreline.

RISK ASSESSMENT

- **Large Commercial Vessel Traffic:** Washington State Ferries operate multiple routes across Puget Sound, with passages *many* times daily.

Recreational Boating: Accidents involving recreational watercraft in the planning area have the potential to result in spills of a few gallons *of gasoline* up to hundreds of gallons of *diesel fuel* various petroleum products (e.g., gasoline, diesel, lubricants).



SPILL RESPONSE OPTIONS AND CONSIDERATIONS section –

FOR FLOATING OIL

- There is no location identified in the “Spill Response Options and Consideration” table (page 2) for the northern portion of the planning area (Sector CPS-1). Many of the matrix categories apply, and response strategies as well as Potential Oil Spill Origin Points (POSOPs) are identified for this sector elsewhere in the GRP. The increased potential risk for spill and the significant number of ecological, tribal, recreational, and economic resources at risk justify consideration for adding a northern location to this section’s matrix table.

FOR NON-FLOATING OIL

- We recommend adding Edmonds to the locations identified in the “Conditions and Considerations for Non-floating Oil” table (page 7) as many of the matrix categories apply.

RESPONSE STRATEGIES AND PRIORITIES section-

- The response strategies for CPS-1 and CPS-2 call out staging areas and the Edmonds Marina sling launch. However, these are not shown on the overview maps for Sector CPS-1. Please check for consistency between the document’s graphics and response strategy information.
- The response strategies for CPS-1 and CPS-2 (Edmonds) should be reevaluated and possibly revised due to, operational concerns, site conditions, and resources at risk. E.g., at CPS-1, there are navigation hazards associated with the ferry and dive park; a “No motorized boats” city code; eelgrass and kelp beds; a nearby public fishing pier. There are numerous site-specific details that would be noteworthy to include in the response strategies, and we would greatly appreciate the opportunity to discuss this further with you.
- There is no response strategy for the Point Wells area yet it is identified as a POSOP (CPS-B). The area is in close proximity to sensitive resources and should have a strategy implementation. Was it inadvertently omitted from GRP?

RESOURCES AT RISK Section-

- Cultus Bay is outside the boundary of the CPS GRP. It is in the adjacent Admiralty Inlet GRP. Recommend deleting from the document’s text and Geographic Areas of Concern Figure 1.
 - There are no resources at risk identified in Sector 1. This is a gross omission due to the presence of productive intertidal and shallow subtidal habitats, eelgrass beds and kelp; salmon, rockfish, lingcod, and other marine fishes; documented forage fish spawning areas; numerous small salmonid streams; Dungeness crab; marbled murrelets; seasonal shorebird and waterfowl concentrations; nesting bald eagles, osprey great blue herons, and purple martins; harbor seal pup haulouts; and whales (orca, gray, and humpback).
 - There are considerable cultural and historical resources along the Edmonds waterfront and nearby shorelines. It would be useful to include the Edmonds Historical Museum on the CPS GRP cultural resources contact list.
 - Add Edmonds Beaches/Marine Sanctuary to the list of “Sites Recommended for Alternative Shoreline Protection”.
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Marine Resources Committee

APPENDIX 6A section-

- Commercial and tribal fishing does occur in the northern part of the planning area, but does not show up in the listing of economic resources at risk.
- Should the public fishing pier in Edmonds (owned by WDFW/operated & maintained by City of Edmonds) and the Edmonds/Kingston ferry terminal (WA state ferries) be included in the list?
- Please add the following:
 - Brackett's Landing (City of Edmonds) to Parks & Beaches
 - Beach Camp at Sunset Bay (Sunsetbaywharf.com) to Public Recreation Areas

These comments are submitted on behalf of the Snohomish MRC to help facilitate a more effective response, in the event of an oil spill in the northern part of the planning area. We hope that our comments and recommendations are informative, and assist you in developing a CPS GRP that is as accurate and comprehensive as possible.

Sincerely,

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cc: Gregg Farris, Snohomish County Surface Water Management Utility Director
