Friends of PLUMAS WILDERNESS

April 5, 2016

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RE: Feather River Geographic Response Plan Comments

Friends of Plumas Wilderness is a non-profit organization dedicated to studying, exploring and maintaining the integrity of natural ecosystems in the Northern Sierra and Southern Cascades. We support the main objectives of the Feather River Geographic Response Plan to identify sensitive natural, cultural or significant economic resources at risk of injury from an oil spill and to describe and prioritize response strategies to reduce injury to resources at risk.

Our organization is seeking Wilderness designation for the Middle Fork of the Feather River. The fact that the Middle Fork of the Feather River was one of eight rivers designated by Congress with the passage of the 1968 Wild & Scenic Rivers Act gives testimony to the unique natural and cultural resources found along this stretch of river. As the Geographic Response Plan accurately states: "The majority of the Middle Fork… is remote and undeveloped." Friends of Plumas Wilderness is concerned about the high risk of an oil spill above the Wild section of the Middle Fork. Due to the rugged and remote nature of the Middle Fork of the Feather River, containment and cleanup of an upstream oil spill would be virtually impossible.

The Union Pacific Railroad Company routes along the Middle Fork and North Fork of the Feather River are classified as "high hazard" routes due to the risks associated with transportation along these corridors. While "high hazard" routes represent only 2% of railroad track in the state, they experience 18% of the derailments. In the last ten years, there have been two derailments along the North Fork of the Feather River. On November 25, 2014, twelve cars derailed near Rich Bar sending corn into the North Fork. On June 30, 2007 a boulder the size of two Volkswagens derailed twenty-two cars above Storrie which spilled 30,000 gallons of highly flammable denatured alcohol (ethanol) and 20,000 gallons of peanut oil.

In 2013, a train carrying Bakken crude oil derailed and exploded in downtown Lac Megantic, Quebec. Tank cars exploded and caused fires that raged for three days and ultimately killed 47 people. If an oil car derailment were to occur in the Feather River canyon during the summer fire season, the chances of

an ensuing forest fire are high. A fire would significantly delay response time for containing the oil spill. In 2000, the 52,000 acre Storrie Fire was caused by Union Pacific employees using grinders and rail saws. In 2008, Union Pacific agreed to pay a $102,000,000 settlement to the Forest Service for causing the fire. The same year, Union Pacific employees caused the 6,112 acre Rich Fire. We suggest that the Geographic Response Plan include strategies for responding to oil spills and forest fires.

Section 7 of the Geographic Response Plan identifies Ecological Resources at Risk but does not include water as a resource. Ecology can be defined as a branch of science concerned with the interrelationships of organisms and their environments. All organisms are dependent upon water in their environment. Water should be included in the Plan as a resource at risk. Water from the Feather River is an extremely important resource as the Plan acknowledges with the statement that "The Upper Feather River Basin watershed is the major source of the California State Water Project which delivers water to more than 23 million Californians for urban, industrial and agricultural water uses".

Under the section Economic Resources at Risk, the Plan identifies "recreational fisheries, public beaches, parks, rafting / kayaking opportunities and facilities, industrial and commercial drinking water and irrigation intakes." This statement does not capture the extent to which California's economy would be impacted if Lake Oroville, the state's primary source of water for domestic and industrial uses, were contaminated by an oil spill. The Geographic Response Plan should include a more thorough economic analysis that provides the value of drinking water in Lake Oroville.

The Geographic Response Plan characterizes the physical features of the Feather River region but does not discuss the stability of geologic formations. A more thorough analysis of the geology of the North Fork and Middle Fork canyons would help determine where incidents may occur and prioritize response strategies. The Feather River Plan states that "the nature of the steep-walled, narrow, Feather River Canyon significantly affects the response strategies…" In fact, the response strategies in the Feather River Plan are prioritized by available access points as opposed to by sensitive receptors as in most Geographic Response Plans.

We suggest that the Feather River Geographic Response Plan 1) identify unstable geologic formations and railroad facilities prone to derailment (e.g. Clio Trestle), 2) store collection booms and cleanup agents near available access points downstream of areas prone to derailment, 3) train employees and partner organizations in the deployment of collection booms and use of cleanup agents, and 4) routinely practice using deployment booms to reduce response time. The Geographic Response Plan should include a cost estimate for geologic and infrastructure analysis, purchasing and storage of collection booms and cleanup agents and routine training exercises.

As stated above, the Geographic Response Plan strategies are prioritized by available access points. However, the Plan does not include all access points on the Middle Fork of the Feather River accessible by two-wheel drive vehicles. A Detail Sheet should be added for Milsap Bar as it would provide a last line of defense before contaminated water could reach Lake Oroville via the Middle Fork of the Feather River.

At the peak of the Bakken oil boom, trains carrying up to 100 crude oil cars traveled down the Feather River Canyon once a week. We urge the Union Pacific Railroad Company not to ship oil on "high hazard" routes, such as the Feather River. If oil is transported on "high hazard" routes, we strongly suggest that the length of trains be limited to 50 cars and speed be limited to 25 miles per hour in canyons.

Even with these precautions, the chances of an oil spill are high in the Feather River Canyon. The probability of an ensuing wildfire would be high. Adequate response would be difficult and wildly expensive. Clean-up of remote sections of the river would be nearly impossible. Given the risks of contaminating California's primary source of drinking water and injuring natural ecosystems recognized by Congress for their unique values, should oil be transported by train in the Feather River Canyon? We suggest that it would be much wiser to transport oil and other hazardous materials via less hazardous routes that are more accessible and not surrounded by fire prone forests.

Darrel Jury, President
Friends of Plumas Wilderness