



1 that applicants are not required to submit a complete application for the proposal. To the  
2 contrary, a project that crosses numerous jurisdictions should call for even more heightened  
3 scrutiny due to the cumulative effects of such a proposal. Hearings on this project should not be  
4 held until such time as Olympic has submitted a complete application. It is not, nor should it be,  
5 the obligation of this County to write the application or design the project for Olympic.

6 Those concerns have only been further exacerbated by the most recent federal ESA  
7 listings in this state. Kittitas County currently has at least four different threatened fish species  
8 listing applicable to this county. Agriculture in this County depends upon water. Most of the  
9 irrigated lands in this County have junior water rights. An ESA listing coupled with the  
10 construction phase disruption to the land and any spill or leak could be catastrophic to this  
11 County.

12 Whether presented as an environmental concern or an economic concern, a spill or leak  
13 could mean disaster. Olympic has made it clear, however, that it will not develop a spill response  
14 plan at this time. They are only willing to do so after the pipeline is approved. The ability or  
15 inability to timely respond to remote locations needs to be addressed at this time to make  
16 knowledgeable decisions about the pipeline design and location. If, for example, particular areas  
17 are inaccessible during much of the year, the pipeline would need to be reengineered in those  
18 areas for enhanced safety, realigned to more accessible locations, or have site certification denied  
19 if such inaccessibility for spill response results in unacceptable risks.

20 Another major concern of this county is the lack of any fire or explosion plan. Again,  
21 Olympic has made it clear that it will not develop such a plan until after the pipeline is approved.  
22 Such critical issues cannot be deferred until after a decision on site certification is made. They  
23 must be done now, not later. The complexity and size of this project does not relieve Olympic of  
24 the obligation to address these completely and in detail before a site certification decision is  
25 made.

1 Olympic obviously has the ability to prepare spill, fire and explosions plans for the  
2 pipeline corridor as proposed in the application. They likewise have the ability to prepare  
3 specific mitigation plans to address local emergency response capacity issues. They have simply  
4 chosen not to do so. If the route were modified during the certification process then they would  
5 have to modify their spill, fire and explosion plans. That is what any applicant for a project  
6 would be required to do as part of the local development review process pursuant to existing  
7 state statutes.

8 Kittitas County is extremely troubled by the fact that it is even necessary that it  
9 participate in these hearings. The limited resources of this County should not have to be  
10 expended addressing a project application that isn't even complete. We will participate,  
11 however, because it is the obligation of the County to protect the interests of this community.

12 Respectfully submitted

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