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| --- | --- |
| Dept. of Ecology logo. | Plan Example: (WAC 173-182-540) planning standards for wildlife response |

# Purpose of these Instructions

This sample plan language is intended to assist plan holders with meeting the requirements of WAC 173-182-535. This sample plan can be used in two ways:

1. As an outline to compare and update your existing plan.
2. As a template to develop a new plan to send to the Department of Ecology.
3. This template was last updated March 2025.

### How to Use this Document

 Your plan does not need to match this sample to be approved. However, your plan must contain the necessary details and narrative which describes your capability in meeting the planning standard this sample was created for.

Your plan is a tool that should be useful to you. The suggested terminology in this boilerplate may differ from your company specific terminology. When you encounter language not typically used by your company, please substitute it with the terms you use. We are not trying to prescribe terminology in the template/boilerplate. We encourage the use of forms, tables, diagrams and checklists in your plan. In addition, pages and sections need to be replaceable when updates occur.

### The following is a color-coded key of additional instruction:

|  |
| --- |
| **Non-highlighted text:** The intent of non-highlighted text is to provide you with general language suggestions for your response plan. It is presented as an example of the type of information that should be included in your response plan. You can use this text as it is written or you may make changes to the text, so that it accurately describes your response capabilities and response posture. |
| **Yellow highlighted text:** Provide us with your company-specific information. Where you see yellow highlights you will need to replace the text with language specific to your company. |
| **Green highlighted text:** Green highlights are used to note instructions and areas where Ecology is explaining what you need to put in your plan. This text should be deleted before you finalize your document. |

## When Ready to Send Ecology Your Plan:

* Remember to delete color coded text and highlights.
* Delete the instructional pages.
* Check footnotes in the document and ensure accuracy of the date and version of the plan you are submitting.
* Number your pages – your plan must have page numbers in it and they should match the page/section numbers of the rest of your contingency plan.
* Check your contingency plan’s table of contents carefully to ensure all pages are correctly identified.
* Complete the cross-reference table and make sure the referenced sections agree with the information location in your contingency plan.
* Insert page breaks so that when printed you can organize the plan in a binder, separated into tabbed sections. This will also make page replacement easier when the plan is updated.
* Send us a hard copy and an electronic version. The electronic version can be sent via email to your company’s Oil Spill Preparedness Planner at Ecology. Send the hard copy to:

Ecology Spill Prevention, Preparedness & Response

PO Box 47600

Olympia, WA 98504-7600

All sections may include minor updates. Of special note, the wildlife contact list was replaced with a link to OilSpills101.wa.gov. This will reduce the need for plan updates when contact information changes.

**This ends the instruction pages. The next page is the start of the sample plan.**

# Wildlife Response Plan

# Section 1: Wildlife Response Purpose and Organization

## 1.1 Introduction

The primary goals of theWildlife Response Plan are to ensure that oiled wildlife response:

* Is conducted in a safe and effective manner for responders, animals, and the public.
* Is fully integrated into the overall spill response and ICS structure.
* Provides resources in a timely manner to minimize the impacts of an oil spill to wildlife.
* Provides best achievable capture and care for spill impacted wildlife based on the specific objectives of the Unified Command for the incident.

Additionally, the plan is designed to:

* Meet all requirements of WAC 173-182-540, and WAC 220-450-100 Planning standards for wildlife response and Washington Department of Fish and Wildlife (WDFW) rehabilitation requirements.
* Provide clear details on the Primary Response Contractor (PRC) and Wildlife Response Service Provider (WRSP) resources required - including personnel, equipment and facilities - under contract to *insert company name* that will be available to carry out the incident specific plan that is developed by the Wildlife Branch and approved by the Unified Command.
* Outline tactical options that the plan holder’s WRSP contractors are skilled in executing and that can be used in developing the incident specific plan.

## 1.2 Plan Organization

The Plan is organized to be consistent with both the *insert company name* Contingency Plan and the Northwest Area Contingency Plan (NWACP) in general, and the sections applying Section 9310 - Northwest Wildlife Response Plan.

# Section 2: Wildlife Response Organization

This plan is designed to be easily integrated into and consistent with the NWACP and utilizes the same organizational structure for Wildlife Response as laid out in Section 9310 v.22. It is not meant to duplicate or provide detailed information on all aspects of oiled wildlife response in an incident. It is intended to provide a high-level overview and refer to existing documents recognized and utilized by NW Area Committee and response community for more detailed information. The Wildlife Branch operates within the Operations Section with close cooperation and communication with the Environmental Unit within the Planning Section. Wildlife Response is divided into three groups under the direction of, and reporting to, the Wildlife Branch Director. As shown in the Wildlife Branch Organizational Chart below (following the NW Wildlife Response Plan) the groups are: Reconnaissance Group, Care and Processing Group, Recovery Group, Field Stabilization Group, and Deterrence Group. Each of these groups have a number of responsibilities and may be broken into a number of units to address the unique needs of each response.



The Wildlife Branch will use oiled wildlife response protocols that are recognized as best practice and have been utilized and improved upon in hundreds of responses throughout the world. These protocols are consistent with the NWACP and are repeatedly referenced within it. They are also consistent with the National Wildlife Rehabilitators Association and International Wildlife Rehabilitation Council’s Minimum Standards for Wildlife Rehabilitation (4th edition 2012). They include NOAA’s Pinniped and Cetacean Oil Spill Response Guidelines (2015), Oil Spill Emergency Response Killer Whale – Hazing Implementation Plan (2014) and Supporting Information for the Killer Whale Section of the Northwest Wildlife, and *your contracted WRSP* Protocols for the Care of Oil Impacted Wildlife.

# Section 3: Initial Response Actions

## 3.1 Activation of the Wildlife Branch

Under the NWACP, the Wildlife Branch is activated when an oil spill is in the vicinity of wildlife resources or has a trajectory that puts them at risk. Initial activation may be only a Wildlife Branch Director if the risk is thought to be low at the outset. The policy of the NW Area Committee is that USFWS will fill the role of Director and Deputy Director of the Wildlife Branch unless they delegate those roles to other parties. As stated in the NW Area Wildlife Plan, unless otherwise indicated by USFWS, the Wildlife Branch Director position will be delegated to the WDFW for spills that occur within the legal boundaries of Washington State. *Insert WRSP name*, an authorized WRSP recognized by Washington Department of Ecology can provide staff experienced as Director and Deputy Director of the Wildlife Branch. Based on the staffing policy of the NWACP, WRSP personnel could take the role of Deputy Wildlife Branch Director working alongside a Wildlife Branch Director from WDFW. Once a Wildlife Branch Director is in place, they will determine the specific immediate priorities. The following actions are typical initial priorities in oiled wildlife response.

## 3.2 Assessment of Potential Impacts and Initial Mitigation Strategies

### 3.2.1 Reporting Impacted Wildlife

Initial efforts will include evaluating any current reports of oiled wildlife. In some incidents the initial responders, members of the public, or local agencies may see or even collect potentially impacted wildlife before the Wildlife Branch is activated. If this occurs, these parties may notify the Washington Emergency Management Division prior to an ICP being established at 800 258-5990 for generic reporting of oiled wildlife. WDFW has an oiled wildlife hotline 800-22-BIRDS tied to a voice mail system that will be activated by WDFW if warranted. Other reporting protocols may be implemented during a response. *If your contracted WRSP has a pre-established oiled wildlife reporting phone number insert here.* Once activated, reporting systems should be quickly supported by live personnel to provide near real time reports of oiled animals to wildlife field personnel.

### 3.2.2 Development of Initial Wildlife Reconnaissance and Monitoring Plan

An early priority will be acquiring real time information on species and number of animals in the response area. Wildlife at highest risk of being oiled are birds and marine mammals, but wildlife encompasses other wild animals, including terrestrial mammals, amphibians, reptiles, fish, and shellfish. The highest priority is to quickly gain a broad overview to help in the planning and prioritization of initial deterrence and recovery efforts and should include species behavior such as feeding, breeding, nesting, and daily movements throughout the area if possible. Aerial surveys may provide a good general picture - especially if the observer is experienced in identifying wildlife from the air - although ground/vessel based teams will likely be required for more specific information. If dedicated aerial wildlife resources are not available, a seat on an overflight conducting spill trajectory observations may be useful for wildlife observations in the immediate spill area. Insert a reference to your contracted air support services and provider that could be utilized.

### 3.2.3 Evaluations of Wildlife Deterrence Options

Keeping animals away from oil is always a better alternative than recovery and rehabilitation and, in some responses, there may be opportunities to keep wildlife from becoming oiled. One means of doing so is to conduct deterrence activities that encourage wildlife to move away from an area in which they may become oiled. Several factors will determine the likely success of deterrence including species, species’ activities, topography, places of refuge, and availability of equipment and personnel. While the Wildlife Deterrence Group as defined in the NW Wildlife Response Plan will probably not be organized immediately, much of this information can be gathered and prioritized during initial assessment/reconnaissance and can be evaluated quickly by the Wildlife Branch Director. Even if it is determined that there are no viable deterrence strategies initially available, there should be continuous evaluation throughout the response to determine whether opportunities for these activities exist. Details on bird deterrence techniques can be found in Bird Hazing Manual: Techniques and Strategies for Dispersing Birds from Spill Sites, Gorenzel and Salmon, University of California Agriculture and Natural Resources Publication 21638. A link to the downloadable pdf can be found at <https://anrcatalog.ucanr.edu/pdf/21638.pdf>. The contracted WRSP (insert name) and PRC (insert name) maintains wildlife deterrence resources such as flags, effigies, and canons. Staging locations and equipment details can be found on the WRRL and in the state approved applications.

### 3.2.4 Evaluation of the Use of Preemptive Capture Options

Preemptive capture is another method for keeping animals from becoming oiled. It involves capture and either holding animals in captivity or relocating them outside of the projected response area. As described in the NW Wildlife Response Plan, preemptive capture may be considered in cases where there are very high priority species that can be safely captured and maintained in captivity or, if relocated, will not immediately return to the site of the response.

### 3.2.5 Evaluate Potential for Impacts Across State Borders

If there is a possibility of impacts to wildlife across state borders (including wildlife oiled on one side that then travels to the other side) a contact should be initiated with the Liaison Officer and relevant trustees to determine how best to ensure an effective response while meeting the needs of the trustee agencies of each state. Selected contacts for the Oregon Department of Wildlife are available in the Wildlife Contact List in the NWACP ICS Tool Kit on https://www.OilSpills101.wa.gov. If there is a recognized threat, there may already be representatives present in the Environmental Unit.

In the case of the potential for impacts occurring across the US/Canadian border, more formalized discussions will be required to evaluate the potential for the movement of wildlife, personnel, and equipment across the international border.

## 3.3 Wildlife Response Plan for Submission to Planning Section

Wildlife response plans will be drafted within the Wildlife Branch based on information collected from the initial notification, overflight observations, and any wildlife assessment conducted by the WRSP. Section 9310 of the NWACP contains a significant amount of information that can assist in development of the initial plan.

Wildlife plans should include tasks associated with the reconnaissance, deterrence, recovery, transport, field stabilization and primary care and processing activities associated with oiled wildlife response based on the needs of the current and following operational period. Activities should accommodate any species groups likely to be impacted and the plan should address any species-specific activities that may be required.

Specifically, the plan should:

* Identify site(s) for Wildlife Care and Processing Facilities.
* Identify site(s) for staging of deterrence, recovery, transport and, if appropriate, field stabilization.
* Provide for activation of initial personnel and equipment resources.
* Reference the most current resources at risk information available from the Environmental Unit (ICS form 232) or from Resources at Risk section of the appropriate Geographic Response Plan (GRP) where the incident has occurred. Links to specific Washington Department of Ecology GRPs can be found at <https://www.oilspills101.wa.gov>.
* List initial prioritized tasks expected to be carried out in the operating period.
* Provide a Wildlife Branch Organization Chart (ICS 207).

The Wildlife Response Plan must be evaluated and updated throughout the response to reflect the changing information, circumstances and priorities as the response evolves.

## 3.4 Whale Reconnaissance, Monitoring, and Deterrence

Southern Resident killer whales are listed as endangered both by the state and the federal government. Minimizing any impacts from an oil spill is an extremely high priority. The WAC 173-182-540 (2) b-d regulations list specific requirements for a plan covering area of potential impacts of whales which may include Southern Resident killer whales. It requires the ability to provide reconnaissance and monitoring of whales outside of the immediate spill area, which has been defined by NOAA as within 50 miles relative to the spill or spill trajectory. Identification of whales to the level needed to effectively respond requires specialized personnel and the proper equipment. Both boat and air surveys should be anticipated. Section 9310.5.5.5 of the NW Wildlife Plan provides guidance on killer whale reconnaissance and Section 9310.5.6.2 provides guidance on killer whale deterrence. These sections also provide links to further guidance documents provided by NOAA to the NW Area Committee that detail appropriate personnel and methods. These include Supporting Information for the Killer Whale section of the Northwest Wildlife Response Plan, which provides:

* Contact details for organizations able to identify killer whales to ecotype, pod and individual,
* Contact details for deterrence equipment
* Oil Spill Emergency Killer Whale Hazing Implementation Plan, which provides guidance on methods for deterrence including pre-approved methods in situations where immediate action is necessary.
	+ Pre-approved methods include helicopters, Oikomi pipes and underwater firecrackers (seal bombs).

### 3.4.1 Vessels and Personnel for Monitoring and Deterrence

Whales can be found in all marine areas of Washington State’s Puget Sound, Strait of Juan de Fuca, and Outer Coast. During an oil spill in, or near, these waters it is crucial to monitor for whales in and beyond the immediate spill area, and to be prepared to deter them away from the oil if necessary. [Plan Holder Name] is committed to supporting whale monitoring and deterrence during an oil spill. This includes the rapid procurement of personnel and aircraft capable of supporting aerial reconnaissance and deterrence, and prompt coordination with the individuals and organizations with authority and resources capable of conducting this work. Aircraft are available through [PRC Name Here]. A list of individuals and organizations capable of conducting whale reconnaissance and deterrence is available in the Wildlife Contact List in the NWACP Section 9310 Appendix A.4 provides a link to these resources at https://www.OilSpills101.wa.gov.

Deterrence of SRKWs can impact their health, and deterrence activities must be done in accordance with federal laws that protect whales. The Marine Mammal Protection Act (MMPA) prohibits harassing, harming, or killing marine mammals, but has an exemption for federal or state employees if the harassment to marine mammals is necessary for the health and safety of the animals. The Endangered Species Act (ESA) has similar prohibitions, but does not have a specific exemption for federal and state employees.

The National Marine Fisheries Service has authorized killer whale deterrence activities to be conducted through a scientific research and enhancement permit held by NOAA’s Marine Mammal Health and Stranding Response Program. The permit is consistent with protections of the MMPA and ESA, and covers oil spill-related actions in Puget Sound and the Salish Sea. Under oversight by Federal and State agencies and, in accordance with the permitting requirements, all marine mammal deterrence operations conducted within the Wildlife Branch will be led by NOAA or the USCG FOSC prior to NOAA becoming engaged.

The Northwest Area Contingency Plan (NWACP) Section 9310, *Northwest Wildlife Response Plan*, describes monitoring and deterrence for large whales including orca. NWACP Section 9310 Appendix A.5 links to https://www.OilSpills101.wa.gov for deterrence resources in the Northwest region, including contact information for each equipment cache and information for ordering new equipment. The Worldwide Response Resource List (WRRL) lists contact information and characteristics on various types of oil spill response equipment, as well as pre-contracted and pre-trained Vessels of Opportunity (VOO) in the Pacific Northwest, that can be called out by [ENTER PRC NAME HERE]. In addition to the resources identified in the NWACP and WRRL, the Washington Department of Ecology enrolls VOO that may be available at the time of a spill to supplement monitoring and deterrence efforts. VOO are registered through the OilSpills101.wa.gov website and can be called-out during drills and spills if needed. The query of the database will be led by the Liaison section through Ecology’s Jetty system upon request by the Unified Command or if the Wildlife Branch Director deems additional volunteer assets necessary.

Additional potential resources to considered when establishing a monitoring program for whales during an oil spill in Washington include: the Pacific Whale Watch Association, Orca Network, and OrcaSound. Pacific Whale Watch Association is a local community of whale watching vessels who may have VOO vessel resources or personnel with knowledge of recent whale locations and movement patterns. Orca Network is a citizen-science based program that tracks the locations of Washington’s Orca whale sightings. OrcaSound is a network of underwater microphones (hydrophones) in the North Puget Sound and San Juan Islands capable of detecting Orca in the surrounding waters. Contact information for these organizations are available in the Wildlife Contact List in the NWACP ICS Tool Kit at https://www.OilSpills101.wa.gov.

# Section 4: Post Emergency Phase Response Actions

Much of an oiled wildlife response occurs in what can be considered the post-emergency phase once the initial plan has been approved, resources are in place, and the range of Wildlife Branch activities appropriate to the incident are taking place. These activities include:

## 4.1 Reconnaissance

Daily reconnaissance activities should be done to identify oiled and unoiled wildlife within the spill response area and surrounding areas. This is done to direct the activities of search and collection teams, to identify opportunities for deterrence of unoiled wildlife and to document impacts of the oil spill and the response activities on animals in the region. In addition to normal reconnaissance activities, in some areas there will be the need for ongoing monitoring of whales, including killer whales well beyond the immediate operational area of the response. Whale deterrence beyond the area of normal operations may be required to reduce impacts to these animals.

## 4.2 Preventing Secondary Oiling Impacts

Preventing secondary oiling impacts should always be done where possible through deterrence and collection of oiled carcasses that may attract predators and/or scavengers. Carcasses should be collected by WRSPs using Chain of Custody forms and transferred to the appropriate Federal entity. Oiled carcasses that will not be kept as evidence, must be disposed of appropriately as hazardous waste. This should include consistent evaluation of opportunities to keep animals from becoming oiled and effectively execute incident specific appropriate techniques keeping unimpacted animals out of the impacted area.

## 4.3 Documenting Impacts

Wildlife impacts must be documented through reconnaissance and collection and processing of oiled carcasses and of live oiled animals. Wildlife recovery teams should be supervised and deployed in an effective and efficient manner utilizing all available information on wildlife movements and activities and matching that information with appropriate techniques, personnel, and equipment. Safety and effectiveness of alternative techniques should be continually evaluated, such as on water capture, night operations, and trapping.

## 4.4 Field Stabilization

Decisions on whether to institute stabilization care in the field followed by transport to designated rehabilitation facilities or simply have recovery personnel transport animals directly to the care and processing facility, must be made and enacted. Field stabilization is the initial mitigation of oiling and is typically initiated when the transport time from the collection point to the rehabilitation center exceeds a few hours. Whenever transport is undertaken, appropriate vehicles to safely transport oiled wildlife to the care and processing facility must be used (e.g., climate-controlled enclosed vehicles for oiled birds). The PRC has a stabilization trailer to support this function. Trailer details and staging information can be found in the WRRL.

## 4.5 Care and Processing

Details on species-specific rehabilitation techniques are documented in other protocols, but all must accomplish the following:

* Document oil impacts and evaluate physical condition for each individual animal.
* Provide stabilization care to ensure fitness for removing oil.
* Remove oil, all cleaning solution residue, and dry feathers or fur.
* Restore the condition of oiled animals to promote survival and normal behavior in the wild.
* Evaluate fitness for release, in consultation with trustee agencies determine site of release and place permanent marking on the animal as appropriate and permitted.
* Transport to release site and release.

## 4.6 Post-release Studies

In collaboration with trustee agencies, post release study opportunities and priorities, such as radio telemetry or color marking, should be discussed as early in the response as feasible. Even where active post-released studies are ruled out, permanent marking of released wildlife should be done following USFWS and NOAA guidelines, when feasible.

## 4.7 Demobilization

A plan for demobilization or downscaling of the Wildlife Branch should be developed midway through the response. Due to the nature of rehabilitating oiled wildlife the activities of the Wildlife Branch are likely to last much longer than most other areas of the response. These activities will continue until all wildlife has been released from the care and processing facility or has been determined to be un-releasable and transferred to permanent care or euthanized. There should be regular evaluation to ensure that the Wildlife Branch is right sized to meet the current objectives of the Unified Command for the Wildlife Branch.

# Section 5: Wildlife Response Resources

## 5.1 Personnel Resources for Wildlife Response

Describe your contracts with applicable wildlife response service providers to provide oiled wildlife planning and response services. Include their ability to provide qualified personnel to staff positions within the Wildlife Branch. Reference their applications for more information.

The West Coast Marine Mammal Stranding Network, Contacts for Washington, identifies regional resources for marine mammal response in Washington and along the Lower Columbia River. This link can also be found in Section 9310 Appendix A.4 of the NWACP, Marine Mammal Resources lists organizations and personnel that have significant experience and expertise in marine mammal capture, handling, deterrence, transport, and husbandry.

### 5.1.1 Specialized Personnel Resources for Killer Whale Reconnaissance, Monitoring, and Deterrence

Section 9310 Appendices A.4 and A.5 of the Northwest Area Contingency Plan list several resources to provide marine mammal specialist personnel to be utilized in killer whale Reconnaissance, Monitoring, and Deterrence under the direction of NOAA staff. Cascadia Research Collective located centrally in Olympia, Washington can be reached at 360-943-7325 and has extensive experience to provide capable personnel in this area.

## 5.2 Wildlife Equipment and Facilities Resources

While some of the equipment and facility resources needed in oiled wildlife response (such as boats and aircraft) are utilized in many areas of the response other resources (such as specifically outfitted trailers) are very specific to wildlife response. Contracts with PRCs provide access to a wide range of equipment and supplies including boats, aircraft, early wildlife response caches, and personal protection equipment (PPE) that can be utilized for oiled wildlife response. *Insert company name* contracts with *insert name(s) of applicable PRC* include the use of their wildlife response equipment. These wildlife equipment stockpiles include specialized equipment for use in recovery and rehabilitation of oiled wildlife. While the equipment has been largely been developed to meet initial needs for birds it can be utilized for a variety of species. A detailed equipment list can be accessed via the Worldwide Response Resource List (WRRL) at [www.wrrl.us](http://www.wrrl.us).

### 5.2.1 Field Stabilization

Field Stabilization is generally the first step in reversing the effects of oiling and requires space and equipment to evaluate wildlife, provide first aid such as supplemental heat and fluids and hold them safely prior to transport to the wildlife rehabilitation facility. Describe the field stabilization equipment you have access to through your PRC.

### 5.2.2 Mobile Rehabilitation Units (MRU)

Describe your contracted access to mobile rehabilitation units and the overall capacity. Include requirements for operational environment.

### 5.2.3 Specialized Equipment for Killer Whale Reconnaissance, Monitoring, and Deterrence

*Insert company name* contract with *insert appropriate PRC name* provides air support that could be used for Whale Monitoring and Deterrence. Note that aircraft and flight personnel must be suitable for extended offshore monitoring operations.

Deterrence equipment - The three methods for killer whale deterrence that have been pre-approved by NOAA Fisheries in certain circumstances are herding/hazing by helicopter, Oikomi pipes, and underwater firecrackers. A set of WDFW Oikomi pipes are stored at IOSA in Friday Harbor. IOSA can be contacted through 360-468-3441. WDFW has additional pipes stored in Olympia and Lakewood. NOAA has a set of oikomi pipes other marine mammal deterrence equipment in Seattle and can be contacted during business hours through Hanna Miller at 206-735-8388 (or 206-718-3807), and after-hours/ weekends via the marine mammals stranding network at 866-767-6114.